

LIVING SUSTAINABILITY.
TOGETHER.

SUSTAINABILITY REPORT 2019

INEOS
STYROLUTION

Driving Success. Together.

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MESSAGE FROM OUR CEO

I am pleased to share with you INEOS Styrolution's latest sustainability report and provide some insights on our commitments and actions to contribute to a circular and low-carbon economy.

We have been on a journey of continuous improvement since we began our sustainability programme in 2014. We initially concentrated our efforts on optimising our portfolio and providing high-quality, safe and durable styrenics products to our customers. To address the increasing global challenges, we have expanded our focus to developing circular solutions.

As I step into my new role as CEO, we commit to further drive our business and operations with the highest environmental, social and governance standards. We believe we are well-positioned to help deliver select UN Sustainable Development Goals (SDGs) through our concerted actions. As the world tackles the far-reaching effects of COVID-19, we have helped combat the spread of this pandemic by safeguarding our employees, supporting local communities and supplying material to produce safety and medical equipment such as COVID-19 detection kits, respiratory devices, safety goggles and face shields.

Our major success story in 2019 was demonstrating the proof-of-concept of

depolymerisation by producing 100% recycled polystyrene at lab-scale. This breakthrough triggered a lot of positive interest from our customers as well as other stakeholders along the value chain, notably at the K 2019 trade fair. Polystyrene has many lives and we have capitalised on the unique, intrinsic properties of this material by investing in different state-of-the-art recycling technologies in parallel. It is easily sortable, has an excellent environmental footprint, and can be used to produce food-grade applications.

Another notable achievement was the introduction of INEOS Styrolution ECO, our family of sustainable products. We set a new standard in the industry with Terluran® ECO, our first ABS product made from post-consumer electronic waste and Styrolux® ECO, the world's first specialty styrenics material made using renewable feedstock. We are working to grow our ECO portfolio over time to make more sustainable solutions available on a commercial scale.

We continue our efforts to reduce our environmental footprint and have cut our greenhouse gas and wastewater emissions, water use as well as landfill waste over the past five years. The promising initial results from two life cycle assessment studies on depolymerisation of polystyrene predict significant greenhouse gas savings. This is a

clear proof point that recycled polystyrene has an excellent environmental footprint.

I am pleased to share that our leadership on sustainability has been recognised externally. We were awarded a platinum rating by EcoVadis, which places us in the top 1% in the category of plastics manufacturers. Our year-on-year improvement over the past seven years motivates us to strive further, however, we are aware of the challenge to not fall back as the assessment becomes increasingly stringent.

Our progress would not have been possible without the passion and dedication of our 3500 colleagues who strive on a daily basis to make our vision of a sustainable future a reality. We continue to collaborate with stakeholders across our value chain – customers, suppliers, technology providers, sorters and recyclers as well as universities and institutes – to deliver innovative, commercial-scale solutions of the same high quality and performance as before. Our investors trust us and share our vision for sustainability.

Compliance with legislation as well as with our own business principles is a precondition for sustainability. Our daily decision-making is based on a strong foundation on compliance with high standards of business practice.

Safety is our core value and we put people's



safety above all else. We will continue to promote a safe and inclusive workplace environment, while providing opportunities for personal development and growth.

We are undertaking major efforts to provide significant volumes of recycled polystyrene to our customers by 2025. By delivering recycled and bio-attributed solutions, we will jointly take a first bold step to significantly reduce our carbon footprint. With this journey ahead of us, we will make our plastics circular and create a positive impact on our planet and our people, and help our customers to meet their sustainability targets.

We invite you to read this report and learn more about our aspiration and achievements to become more sustainable and welcome your suggestions and support.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'S. Harrington'. The signature is fluid and cursive.

Steve Harrington
CEO INEOS Styrolution

BOARD MEMBERS' VIEW



“ As the leading styrenics supplier, we have embarked on a journey to lead the way by operating sustainably. We focus on resource efficiency and are developing initiatives and projects to reduce our environmental footprint. Zero accidents is lived every day at our production sites and offices, with a clear focus on key indicators to relentlessly learn and adjust. We have reached our best-ever safety performance over the last twelve months and will continue to improve our actions to prevent pellet loss.

PIERRE MINGUET
President Operations

“ Finance is an integral part of our sustainability efforts and we are seeing increasing relevance of sustainability performance in our operations and investments. We are dedicated to meeting the expectations of our stakeholders including investors, financial experts and rating agencies to address sustainability in all our business areas.

MARKUS FIESELER
Chief Financial Officer

“ Our customers are looking to us for sustainable offerings for their applications, ranging from using recycled materials at the outset or making them recyclable after use. In addition to creating new products containing a significant percentage of recycled material from post-consumer recycling schemes, we are improving our supply chain to ensure access to these recycling sources. We are working hard to provide our customers with innovative, best-in-class solutions that support their sustainability objectives.

ROB BUNTINX
President Asia-Pacific*

“ We are strongly committed to contribute to the development of a circular economy. With polystyrene, we offer an extremely versatile product that also stands out with its unique properties as a true circular polymer. It can be recycled using different technologies (mechanical and depolymerisation) allowing our customers to benefit from polystyrene applications while meeting their own sustainability goals.

ALEXANDER GLÜCK
President Europe Middle East & Africa*

“ Styrenics are circular. We have made significant progress in scaling-up existing technologies that enable the circularity of polystyrene as well as our other polymers. But we don't stop here. We are collaborating with technology providers along the value chain, recyclers, governmental authorities, and most importantly with our customers to enable a circular economy for all our styrenics products.

GREG FORDYCE
President Americas*

*These positions were effective August 1, 2020.

OUR COMMITMENT TO SUSTAINABILITY





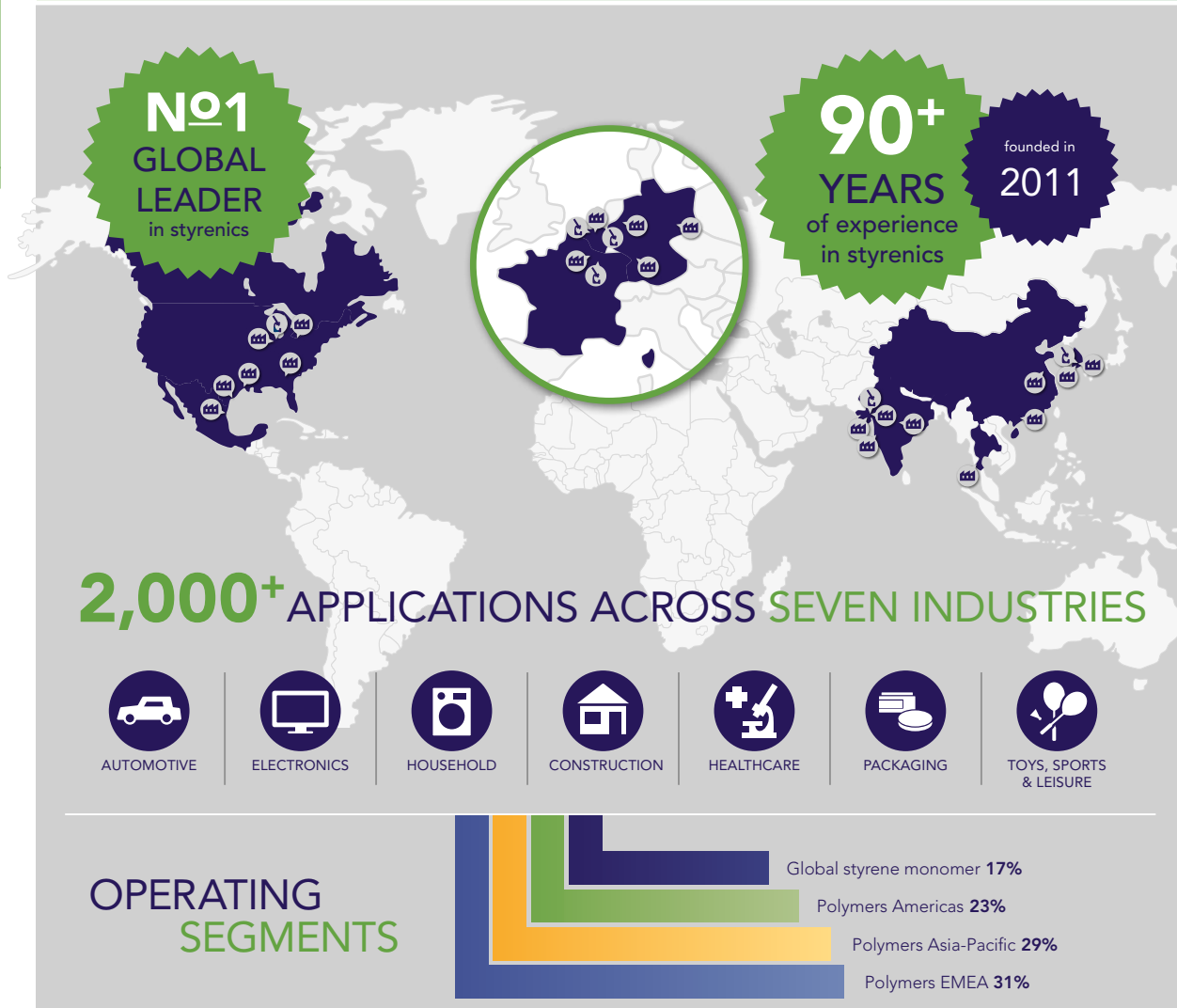
For INEOS Styrolution, sustainability is a lever for growth and will enable us to tap into new and emerging business models. We are committed to enabling a circular economy for styrenics, further improving our carbon footprint and promoting sustainable operations throughout our entire value chain.

INEOS STYROLUTION AT A GLANCE

INEOS Styrolution is the leading global styrenics supplier with a focus on styrene monomer, polystyrene, ABS standard and styrenic specialties. As of December 31, 2019, the company operated 20 manufacturing sites in Belgium, Canada, China, France, Germany, India, Mexico, South Korea, Thailand and USA, with six R&D centres and 24 sales offices around the globe.

INEOS Styrolution has four headquarters around the world – the global and EMEA headquarters for specialties in Frankfurt am Main, Germany, the EMEA headquarters for commodities and standard products in Rolle, Switzerland, the American headquarters in Aurora, Illinois, USA, and the Asia-Pacific headquarters in Singapore.

3,500+ EMPLOYEES |
 10 COUNTRIES |
 20 PRODUCTION SITES |
 6 R&D CENTERS |
 24 sales offices



APPROX. **1,000** PATENTS

4,000+ CUSTOMERS

1,500+ PRODUCTS

3,717 KILOTONNES OF STYRENE MONOMER, POLYSTYRENE, ABS STANDARD & STYRENICS SPECIALTIES SOLD

4.9 BILLION EUROS IN REVENUE

4 BILLION EUROS TOTAL ASSETS

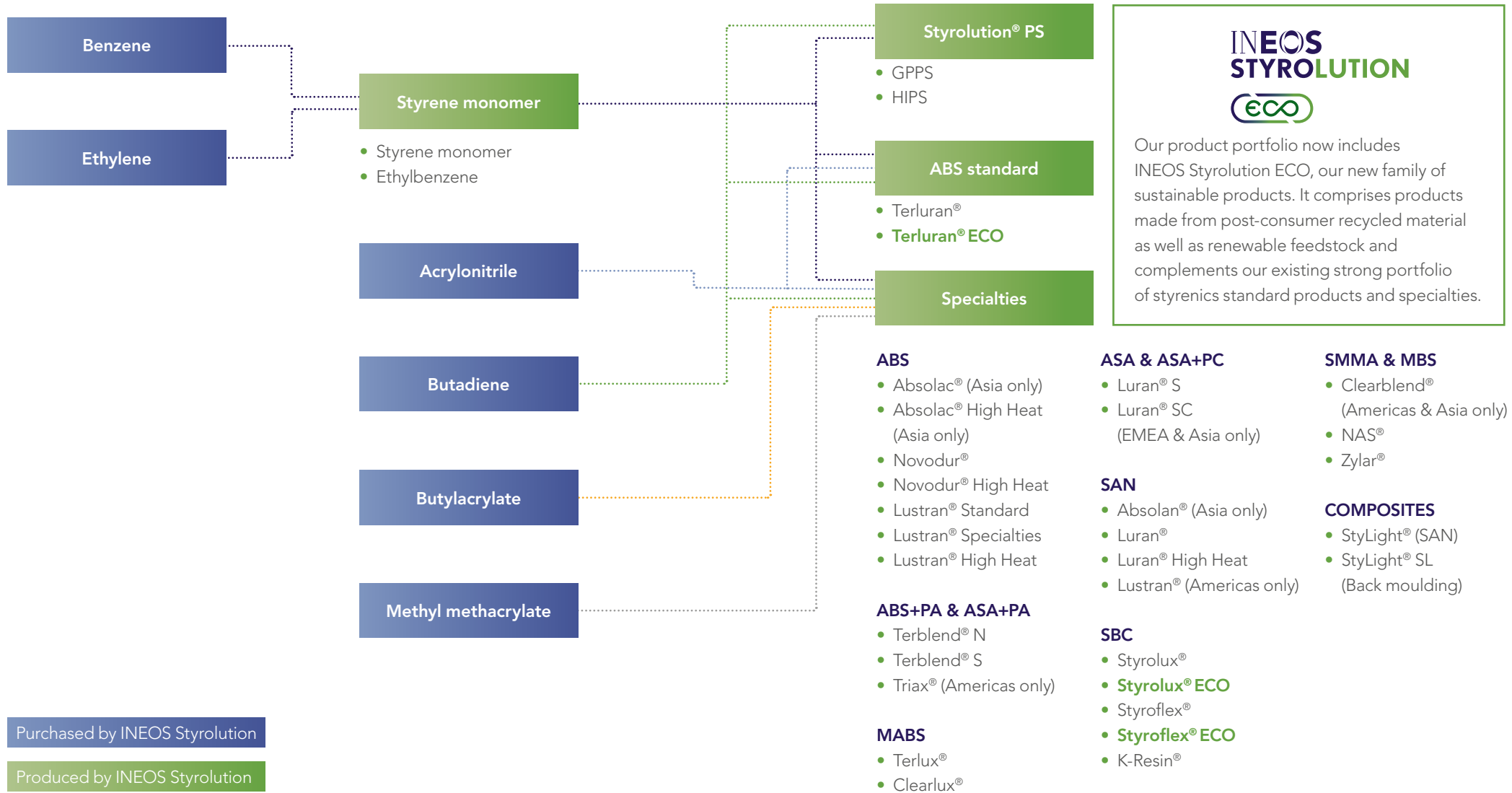
2 BILLION EUROS TOTAL EQUITY

2 BILLION EUROS TOTAL LIABILITIES INCLUDING FINANCIAL INDEBTEDNESS

as of December 31, 2019



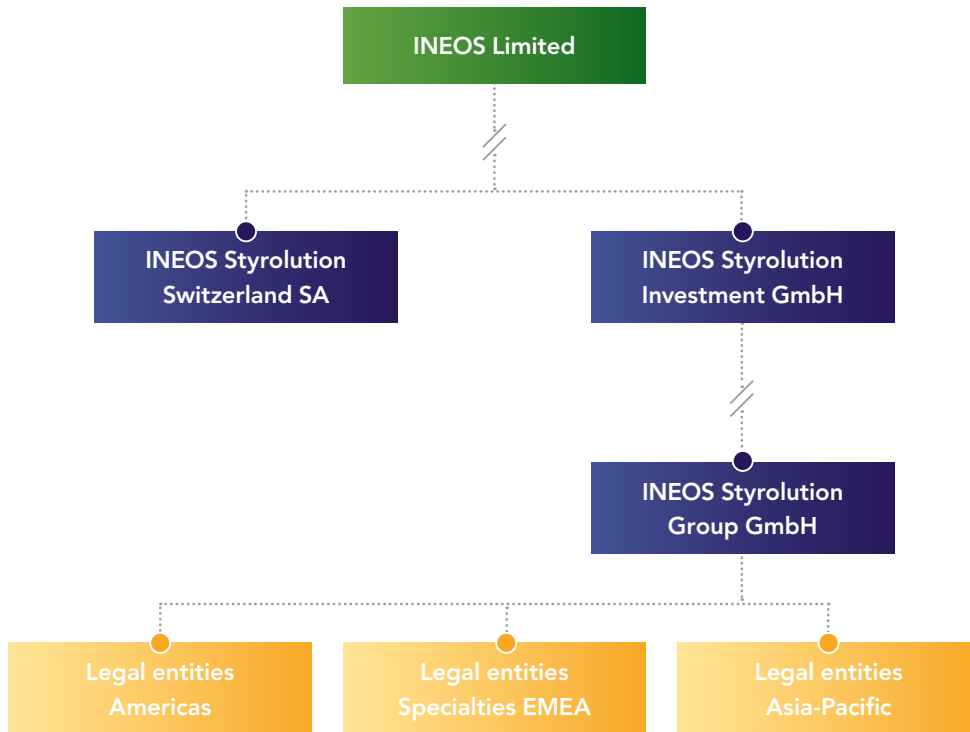
OUR PRODUCT SCOPE IN THE STYRENICS VALUE CHAIN





OWNERSHIP

INEOS Styrolution is wholly owned by INEOS Limited.



SIGNIFICANT CHANGES TO THE ORGANISATION

Effective July 1, 2020, Steve Harrington was appointed as the company's Chief Executive Officer. Prior to this, he was President Asia-Pacific and Global Styrene Monomer for INEOS Styrolution. He succeeds Kevin McQuade, who was appointed Chairman of INEOS Styrolution effective July 1, 2020.

Alexander Glück, former President Americas was appointed President Europe, Middle East and Africa. Rob Buntinx, former President Europe, Middle East and Africa was appointed President Asia-Pacific. Greg Fordyce, former Vice President, Supply Chain Americas, was appointed President Americas. All these positions were effective August 1, 2020.





OUR SUSTAINABILITY FOCUS

INEOS Styrolution intends to operate and develop its business in a way that balances current and future needs, taking into account economic, environmental and social factors so that we can sustain and further grow our business in the long term.

Our focus industries are driven by sustainable megatrends such as ...

DEMOGRAPHIC CHANGE
 CLIMATE CHANGE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS
 RESOURCE SCARCITY
 CIRCULAR ECONOMY ENERGY EFFICIENCY
 RISING LIVING STANDARDS IN EMERGING AND DEVELOPING COUNTRIES MARINE LITTER
 URBANISATION

Our vision

To be recognised as the global leader in sustainable styrenics solutions

Our mission

To utilise our entrepreneurial culture to deliver long-term value to our customers and stakeholders. We do this by operating in a safe, environmentally and socially responsible manner to provide sustainable styrenics solutions across the full lifecycle of our products.



OUR APPROACH

Styrenics are one of the most versatile materials in the 21st century, and have revolutionised the way we live today. Our products have become an indispensable part of consumers' everyday lives and provide solutions to societal challenges such as climate change, resource scarcity, urbanisation, rising living standards and population growth. Our products extend food shelf life, thereby reducing food waste while also providing lightweight solutions leading to lower fuel consumption. Some of our plastic products have become even more indispensable in the fight against COVID-19. Our styrenics materials are being used to produce safety equipment such as safety goggles and face shields as well as medical devices such as COVID-19 detection kits, intubation devices, infusion sets and blood pressure monitors.

We are taking a step-wise approach to move towards a low-carbon economy.

Shifting to a circular economy: As a first step, we are working to close the loop at the end-of-life phase of our products. We have invested in mechanical and advanced recycling of our polystyrene and ABS products, which we believe will significantly reduce our carbon emissions. On the one hand, we have recycling processes with a lower greenhouse gas footprint compared to virgin feedstock; on the other hand, we avoid landfill or incineration and allow for multiple

recycling rounds. Moreover, we collaborate with the entire value chain including sorters and recyclers to ensure a consistent, high-quality supply of post-consumer styrenics that we can recycle.

Modal shift: To keep the environmental footprint of our products low, we reduce the impact caused by transportation. Therefore, we rely on an intermodal distribution model of trains, ships and trucks to find the most efficient route to distribute our products.

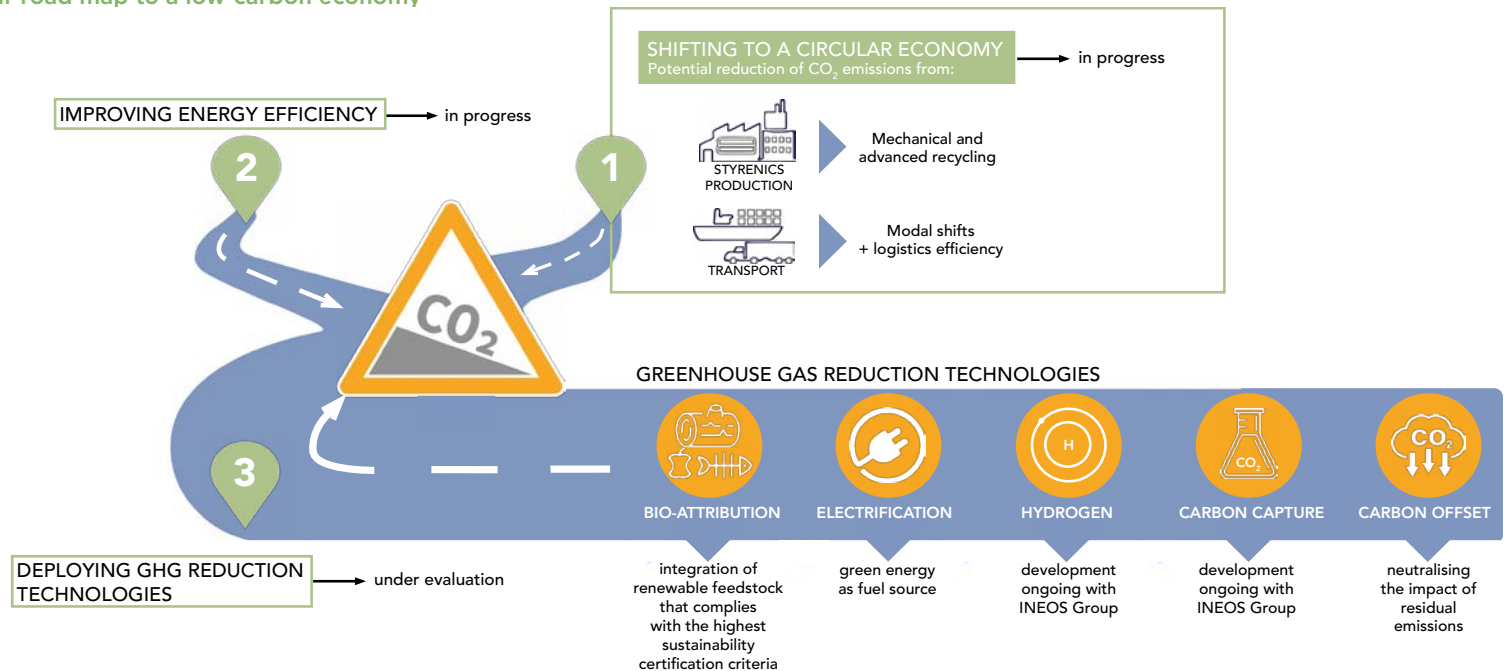
We favour the use of rail and sea transport, rather than road-based transport and encourage our customers to order in bulk when possible, to further lower our transport footprint.

Improving energy efficiency: Styrenics products are durable and weather-resistant, making them a longer-lasting and energy-efficient alternative to other materials. We are incrementally improving our operations by efficiently using raw materials and optimising

of our production processes. In addition, we also invest in technology upgrades at our manufacturing sites and implement energy reduction projects as part of our operational excellence programmes.

Deploying GHG reduction technologies: We now offer the integration of renewable feedstock as a replacement for fossil fuel that complies with the highest sustainability criteria. This bio-attributed approach uses fewer fossil resources and has a 50% to 90% lower

Our road map to a low-carbon economy



Adapted from: "Mission Possible" by Energy Transitions Commission



greenhouse gas footprint (depending on the feedstock and polymers) when compared to styrene produced by fossil fuel.

This allows us to reduce fossil fuel consumption as well as save GHG emissions. In comparison with certain types of biopolymers (which although bio-based, are not always recyclable), this approach supports the use of bio-feedstock as a drop-in solution in highly optimised, large-scale petrochemical installations to produce circular solutions such as recycled polystyrene and ABS.

Today, part of our electricity consumption is already based on green energy. Together with the INEOS Group, we are looking at new technologies such as carbon capture and utilisation as well as using increasing amounts of hydrogen in our furnaces to reduce carbon emissions. The use of carbon offsets for residual emissions is our last option.

As this is the beginning of our journey to a low-carbon economy, some technologies are still in the initial stages, while some technologies are more mature yet requiring further development. However, we believe this is the only way forward. While major steps are now being taken to close the loop and provide circular plastics, reducing our carbon footprint in the medium term is part of our sustainability agenda. Our objective is to develop innovative and circular solutions with a lower carbon footprint.

AS AN INDUSTRY ...

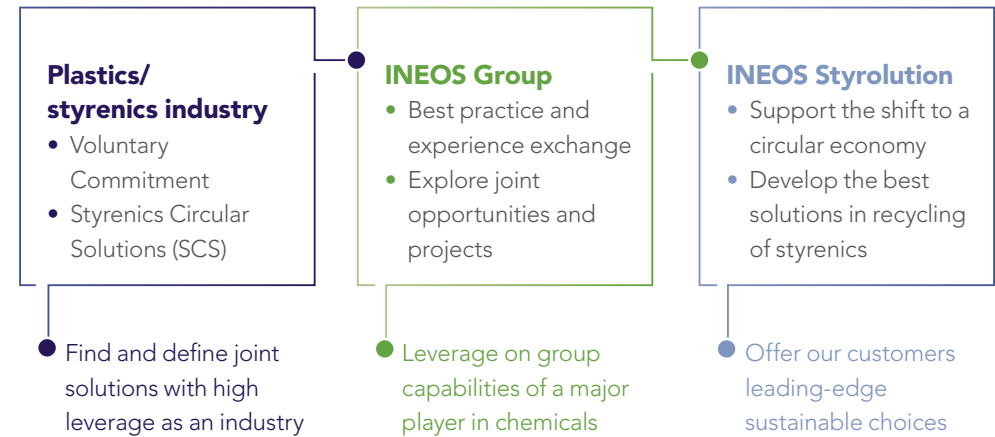
...we are committed to playing a key role in contributing to innovative and sustainable solutions, together with our value chain. Together with the European plastics industry, we have set a series of ambitious targets and initiatives called "Plastics 2030: PlasticsEurope's Voluntary Commitment to increasing circularity and resource efficiency," to achieve the goal of 100% reuse, recycling and recovery of all plastics packaging by 2040.

We are also one of the founding members of Styrenics Circular Solutions (SCS), promoting circular solutions in the industry in collaboration with the complete value chain.

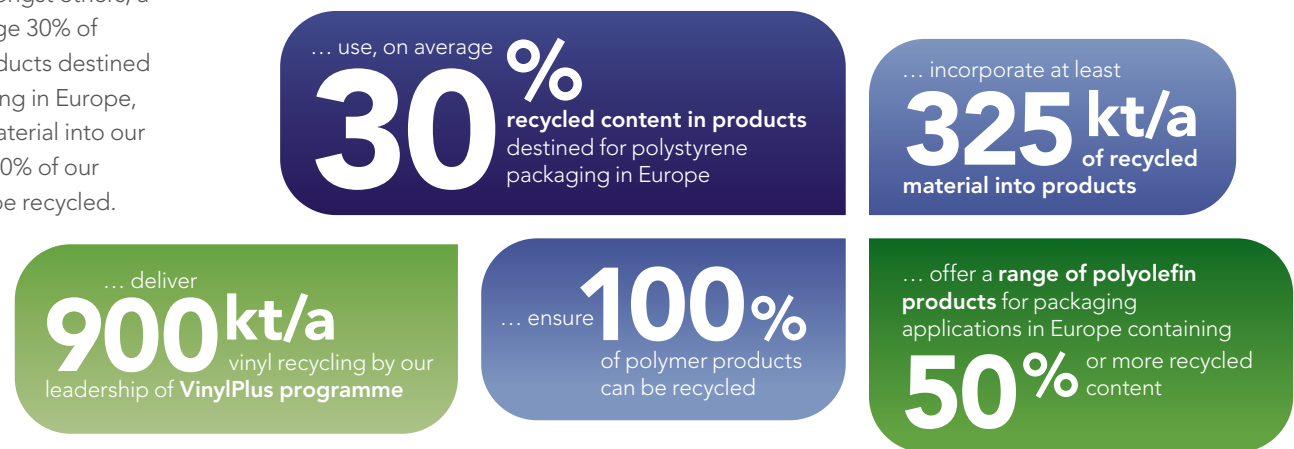
AS A MEMBER OF INEOS GROUP ...

...we are committed to achieving the following five ambitious targets that were set by our parent company for 2025. This includes, amongst others, a pledge to use on average 30% of recycled content in products destined for polystyrene packaging in Europe, incorporate recycled material into our products and ensure 100% of our polymer products can be recycled.

We are actively contributing to a circular economy – as an industry, a group and a company



By 2025, INEOS will ...





AS A COMPANY ...

...we build on the fact that styrenics, and in particular polystyrene, is very well suited to recycling due to its excellent and proven sortability and its unique properties, allowing for a range of recycling technologies. Globally, we are collaborating with a number of leading technology companies to implement technical and commercial solutions as well as beneficial life cycle assessments (LCA) to close the loop for styrenics, thereby helping to reduce waste to landfill and incineration.

Converting post-consumer waste to a raw material for our polymer production is our key challenge. Together with several technology providers, we have proven the technological and economic feasibility of polystyrene depolymerisation and upscaling is underway. In addition, we have proven excellent environmental footprint of the solutions, where the greenhouse gas (GHG) emissions is significantly lower compared with fossil production and has additional significant end-of-life savings. This underlines the benefits of this approach.

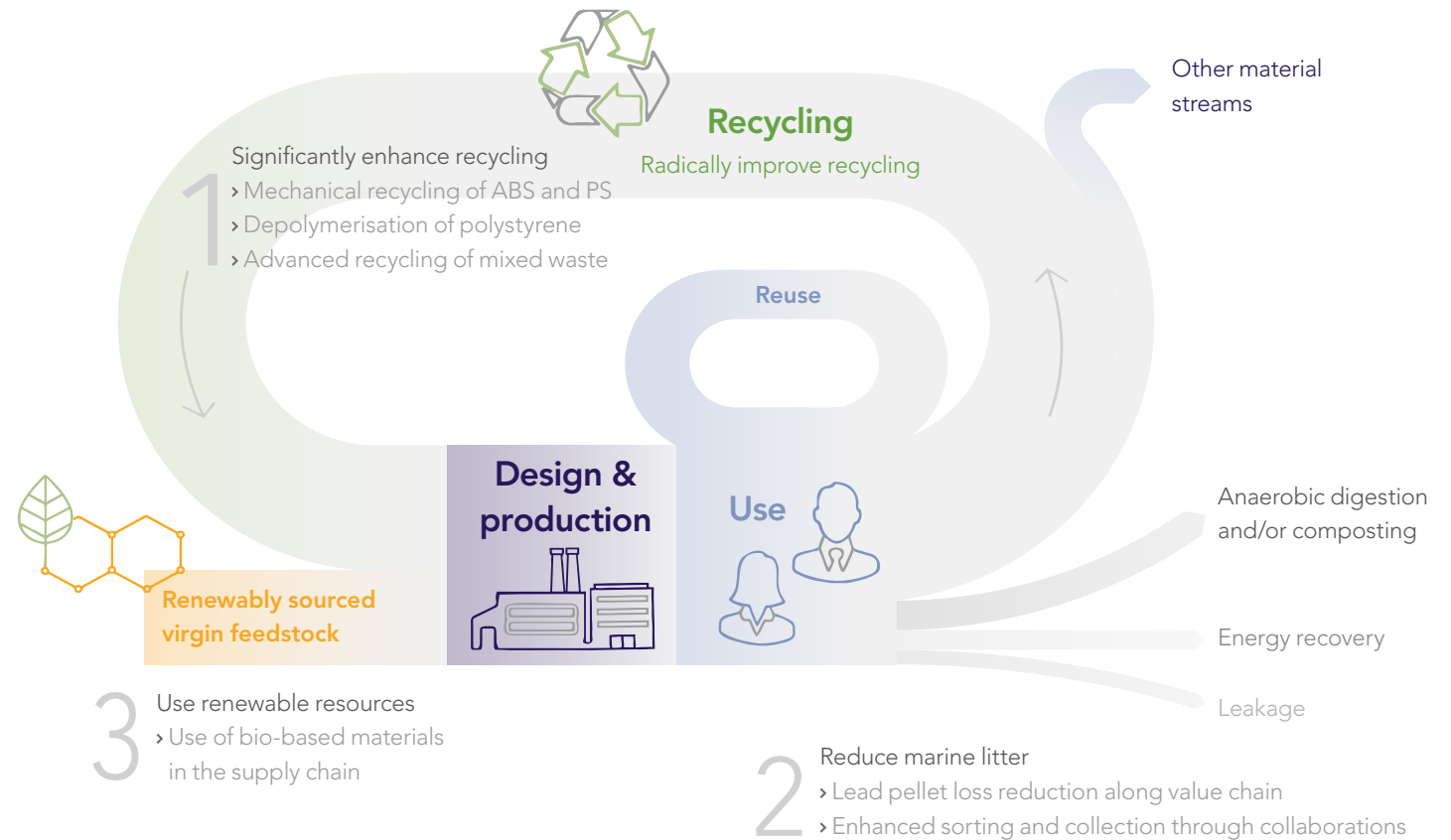
Instead of only using virgin raw materials to manufacture products that could end up as waste, we see an opportunity in converting this plastic waste into raw materials for the plastics industry, making the value chain circular.

We undertook two LCAs of our polystyrene recycling process to compare the GHG

footprint of recycled polystyrene versus virgin polystyrene. Initial results of the German government-funded Resolve project and an internal GHG calculation study predict CO₂ equivalent emission savings between 37% and 50%, respectively. Both these studies rely on

assumptions and the best available data and are thus open to some inaccuracy. However, these initial findings are extremely promising, and we will continue to push these technologies forward to contribute to a circular economy for styrenics.

Contribution of styrenics towards a circular economy



Adapted from: "A New Plastics Economy: Rethinking the Future of Plastics" by World Economic Forum, Ellen MacArthur Foundation, McKinsey & Company



OUR SUSTAINABILITY TEAM AND WORKING STRUCTURE

We have a dynamic team that manages our sustainability efforts across all our business areas. For each business area listed below, we have established a work stream staffed with global and regional experts, driving the implementation of our sustainability programme. The responsibility for steering and aligning our company-wide sustainability strategy lies with our steering committee, chaired by management board members. The steering committee sets targets, gives

strategic guidance, creates and implements initiatives and ensures top management backing. The team is supported by an internal ambassador group, comprising colleagues from all functions, regions and levels. It is their role to promote sustainability within and outside our company.





DETERMINING WHAT IS MATERIAL

We regularly engage with our stakeholders to understand the sustainability issues that are of relevance to them and important to our business. To ensure we prioritise these issues, we periodically conduct a formal materiality assessment. In accordance with the reporting framework of the new GRI Standards, we undertook a focused materiality assessment in 2017 involving key internal and external stakeholders.

the management board in depth, and evaluated in light of the company's objectives, strategy and current development targets. In addition, an external verification of the matrix was also undertaken. The matrix shows the position of all our 16 material topics relative to the degree of stakeholder interest and potential business impact. We have developed KPIs and targets for the three newly added topics, which we have shared in this report.

MATERIALITY ASSESSMENT PROCESS

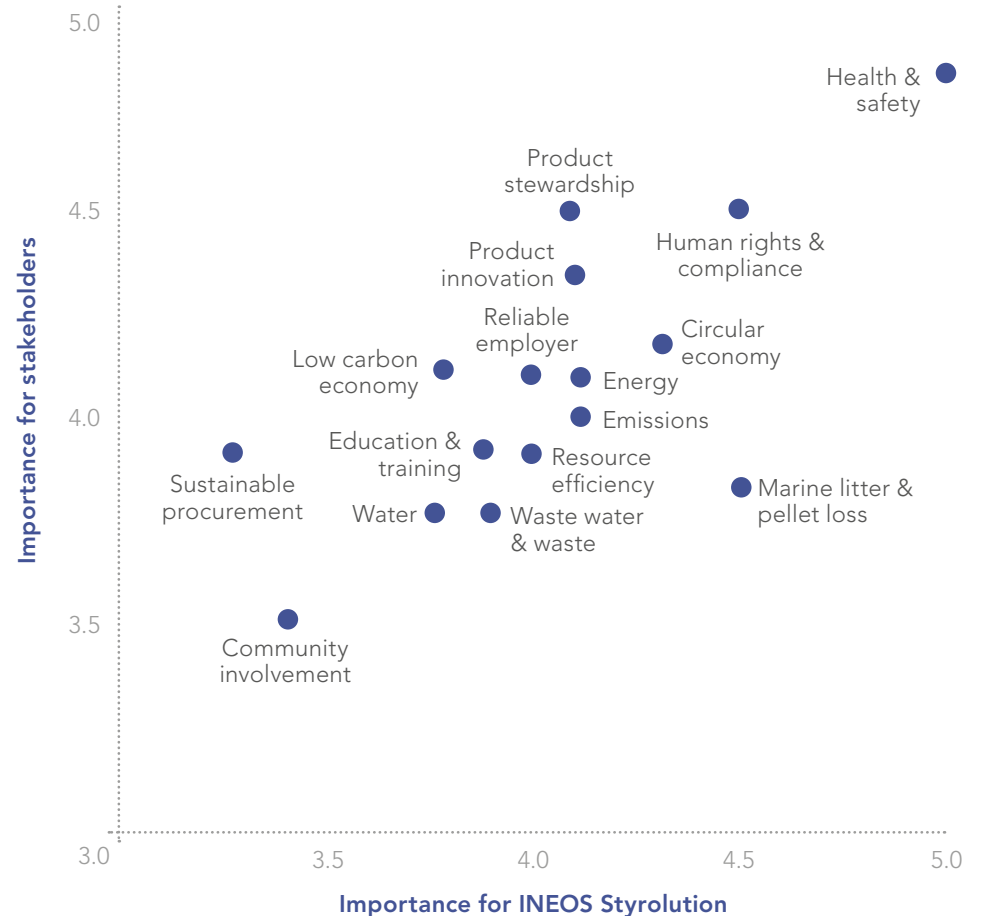
The starting point for the current materiality matrix was based on the findings of our materiality analysis conducted in 2014-2015. We re-evaluated these findings in 2017, and taking into account current trends and developments, we included three new topics – circular economy, low carbon economy, as well as marine litter and pellet loss. We then decided on 16 topics that we deemed as most important for our stakeholders as well as most relevant to our business.

We use the materiality assessment findings to prioritise the sustainability topics in our report so that it responds to our stakeholders' needs and expectations. The results of this assessment will be reviewed and approved by internal and external stakeholders on a periodic basis to confirm relevance and appropriateness.

External and internal stakeholders were identified based on their impact on our business operations and their knowledge of our business activities. All our key stakeholders represented a wide variety of functions, regions and business segments.

The views of our stakeholders were incorporated into a matrix, discussed with

Materiality matrix





THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

The United Nations Sustainable Development Goals (UN SDGs) are essentially a materiality assessment of our planet and lay out a path to end extreme poverty, address inequality and injustice, and protect the earth. These goals provide guidance and direction on sustainable development for both industry and society. We strongly believe that we can contribute positively to these goals through our concerted sustainability actions. We have indicated below where we are focusing our sustainability efforts towards meeting these goals.

Amid the unprecedented global pandemic we are facing today, we continue to help our customers find solutions to tackle COVID-19. Our company supplies materials that are used in a variety of applications used in the fight against this disease. These applications are used for diagnosis (blood analysis kits), treatment of patients (ventilators, IV sets), and personal protective equipment (safety goggles and face shields).

For more information on the UN SDGs, please visit www.un.org/sustainabledevelopment

OUR PRIORITY IS TO ADDRESS THE FOLLOWING SDGs



Contributing to a circular economy by developing innovative and sustainable solutions. Read more: "Shaping the future with sustainable styrenics"



Ensuring resource-efficient production and use of our products. Read more: "Reducing our environmental footprint"



Shifting to a low carbon economy and taking action to combat climate change and its impacts. Read more: "Reducing our environmental footprint"



Addressing marine litter and pellet loss in our operations as well as in our value chain. Read more: "Reducing our environmental footprint" and "Driving sustainability along the value chain"



Forming strategic partnerships to drive sustainable development across our entire value chain. Read more: "Our commitment to sustainability" and "Shaping the future with sustainable styrenics"

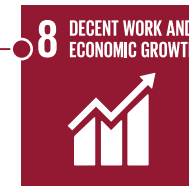
AS PART OF OUR EFFORTS TO ENSURE A SUSTAINABLE BUSINESS, WE ALSO ADDRESS THE FOLLOWING SDGs



Ensuring the health and safety of our entire workforce. Read more: "Upholding safety as our core value" Promoting the well-being of our workforce as well as the people living in the communities we operate in. Read more: "Engaging and developing our employees" and "Supporting the communities in which we live and work"



Promoting lifelong learning opportunities through training and development of our workforce. Read more: "Engaging and developing our employees" Supporting education and provide necessary infrastructure to ensure inclusive education in our local communities. Read more: "Supporting the communities in which we live and work"



Driving sustainable economic growth through investments and strong business performance. Read more: "Making sustainable growth a reality" Promoting productive employment and decent work for all. Read more: "Engaging and developing our employees" and "Ensuring fair business practices"



SUSTAINABILITY HIGHLIGHTS

Here is a selection of our key achievements that demonstrate our sustainability performance in our key focus areas.

OVERALL

EcoVadis platinum rating



ICIS innovation award
for advanced recycling of polystyrene

SAFETY

Total case injury rate (TCIR) of **0.12** compared to an overall target of 0.25

RESPONSIBLE OPERATIONS

3.1% reduction in greenhouse gas emissions

Audits for **bio-attributed** offerings conducted in Antwerp

SUSTAINABLE PROCUREMENT

Launch of **ECO sourcing strategy** with procurement of **renewable** and **post-consumer waste** as future **feedstock**

RESPONSIBLE PRODUCTS

Launch of **ECO** range of sustainable products

Polystyrene produced from **100%** recycled monomer at lab-scale

ABS grades with **post-consumer recycled** material introduced

World's first **specialty styrenics** material made using **renewable feedstock** introduced

Life cycle assessments conducted to calculate **carbon footprint** of polystyrene depolymerisation

RELIABLE EMPLOYER

Implementation/ first merit round in **Compensation module of HR Information system**

Development and launch of our **regional recruitment website in EMEA**

FAIR BUSINESS PRACTICES

Biennial training on **Code of Conduct** conducted globally

Global training on **data protection regulation** launched



SUSTAINABILITY TARGETS AND ACTIONS

We committed ourselves to short-term and medium-term global sustainability targets and actions covering key focus areas of our business. Here is an update of our progress in the past year.

RESPONSIBLE PRODUCTS

30% recycled polystyrene in plastic packaging in Europe by 2025 In progress

Offer recycled ABS at commercial scale by 2020 Achieved

Established certification for **recycled and bio-attributed** content in our product offerings by 2020 Achieved

RESPONSIBLE OPERATIONS

100% of sites ISO 14001 certified by 2019 Achieved

7% reduction* of VOC by 2019 Under review (due to changes in legislation, acquisitions, and advanced measurements)

Operation Clean Sweep® audits for all sites by 2020 In progress (postponed to 2021 due to COVID-19 restrictions)

(*baseline year 2015)

RELIABLE EMPLOYER

80% of exempt employees to have an Employee Development Interview Achieved (91%)

Implementation of **Management Development Programmes** in all regions in 2019 Achieved

Employee survey for the entire workforce conducted in 2020 Postponed to 2021 due to COVID-19 restrictions

FAIR BUSINESS PRACTICES

Online refresher training on **anti-bribery, anti-corruption, and anti-money-laundering** NEW!

SUSTAINABLE PROCUREMENT

100% of buyers trained on sustainability in 2019 Achieved

80% of total supplier spend to be third-party assessed by 2020 On track (78%)

Sustainability to be included as a key component in **supplier excellence programme** by 2020 In progress

SAFETY

Continuous improvement of our company's **safety performance** In progress

Annual total case injury rate **(TCIR) of 0.25** Achieved (0.20)



STAKEHOLDER DIALOGUE

Engaging stakeholders and developing meaningful partnerships with them over time is essential for our long-term business success. We realise that regular, open and proactive dialogue with all relevant stakeholders helps us to understand their perspectives, expectations, key issues and needs.

In this way, we are able to integrate them into our business decision-making processes wherever possible, ensuring that our strategy addresses the issues that are important to them. Dialogue with stakeholders gives us the opportunity to explain our clear and committed approach to sustainability as well as the value of our work, and our products and services for society.

We have identified our key stakeholders as those who contribute to our economic, social and environmental performance. These stakeholder groups comprise our customers, suppliers, employees, investors, financial experts and rating agencies, local communities, technology partners, industry associations, NGOs, universities, scientific institutions and value chain partners such as waste sorters and recyclers.

We hold membership in national and international industry associations, such as the European Chemical Industry Council (cefic), PlasticsEurope, Styrenics Circular Solutions

(SCS), Circular Plastics Alliance (CPA), the Chinese International Chemical Association (AICM), the Styrene Information & Research Center (SIRC), the Plastic Food Packaging Group in the American Chemistry Council, the World Plastics Council, the Roundtable for Sustainable Biomaterials (RSB), as well as local community advisory panel organisations in Canada, Mexico and USA.

INEOS Styrolution employees are passionate

and committed to making the company a sustainability leader. They are keen to learn, understand and support our sustainability approach and initiatives, and become ambassadors in their peer groups inside and outside of the company.

Therefore, we set up an integrated concept that puts sustainability on the agenda of group and regional conferences, management and sales meetings, as well as town hall events.

In addition, we have rolled out internal communication activities via multiple channels, to openly inform colleagues on our programme, initiatives and progress and to establish a feedback channel for all employees to make sure they have the opportunity to contribute and make their voice heard.

STAKEHOLDERS	METHODS OF ENGAGEMENT	KEY TOPICS
Investors, financial experts & rating agencies	Quarterly disclosures, sustainability report, annual investor days, investor relations releases	Strategy, performance, market and corporate developments, sustainability
Customers	Innovation workshops, sustainability report, customer meetings, direct engagement, industry trade group meetings	Strategy, performance, sustainability, product quality, safety and reliability (safety data sheets)
Suppliers	Direct engagement, assessments and audits	Product quality, safety and reliability, sustainability
Employees	Group & regional conferences, town hall meetings, work council meetings, workshops, management board briefings, sustainability report, intranet, eMagazines, newsletters, training sessions, webinars, anonymous 24/7 hotline	Strategic initiatives, business performance, policies, IT security, new developments, personnel changes, R&D, innovation, sustainability, health and safety
Industry associations	Memberships, direct engagement, task force & working group engagements, dialogue, conferences, workshops	Sustainable business practices
Universities, scientific institutions & technology partners	Direct engagement, collaborative partnerships, quarterly face-to-face meetings	R&D, innovation, sustainability
Local communities	Direct engagement, collaborative partnerships, sports and educational programmes, employee volunteering, sponsorships	Community sponsorships, volunteering, local engagement
Non-governmental organisations	Direct engagement, dialogue, conferences, workshops	Sustainable business practices
Value chain	Direct engagement, collaborative partnerships, face-to-face meetings, joint development projects	Sustainable business practices

SHAPING THE FUTURE WITH SUSTAINABLE STYRENICS





We strive to provide sustainable solutions to our customers and end-consumers by taking a responsible approach to our product portfolio across the entire value chain.

OUR APPROACH

As the global market leader in styrenics, we take a holistic approach looking at our entire value chain. Our aim is to create sustainable styrenics solutions that have the product performance and properties on par with conventional solutions – for all applications using styrenics today and in the future. Together with customers and a variety of waste sorters, recyclers and technology providers, we engage in collaborative innovation of cutting-edge sustainable products. Product stewardship and quality management play a pivotal role in this process, ensuring compliance with product regulations and delivering safe, best-quality and high-performance products to our customers. Together with associations and our business partners, we strive to achieve high and well-acknowledged sustainability standards in the styrenics industry.

Marine litter, inadequate waste management systems, low recycling rates and lack of end-of-life solutions for plastics waste are

significant challenges not only for original equipment manufacturers, plastics packaging producers and plastics manufacturers, but also for our society. Currently, efficient waste management solutions are not available in every region of the world. We are aware that some of our products are used in single-use applications and we cannot accept that inefficient or lack of inadequate waste management cause these products to end up in marine and land environments where they do not belong.

Instead of disposing polystyrene and other styrenics products after a single use, a tangible solution is to close the loop to contribute to a circular economy: collect plastic waste, sort it, recycle this valuable resource and use it again as a raw material to produce polystyrene and other styrenics products. The entire styrenics industry has undertaken a significant amount of effort to analyse, plan, and develop these recycling processes. Investments are underway to make this a reality and to unlock the true potential of styrenics in the circular economy.

Due to its moderate decomposition temperature and good barrier properties, polystyrene has an excellent performance in major recycling methods, such as mechanical recycling, dissolution, depolymerisation, and advanced recycling of mixed waste.

It has excellent properties for sorting and with

near-infrared technology up to 99.9% plus purity can be reached. Polystyrene also has intrinsic properties that allow for thermal depolymerisation into a styrene monomer. This straightforward process brings sorted polystyrene waste back to styrene in just one step, which after purification gives us back a highly valuable monomer. This process avoids multiple steps compared to traditional fossil production, resulting in depolymerisation contributing to significant greenhouse gas savings.

This approach shows demonstrated technological, environmental and economical savings across the life cycle of polystyrene. It allows us to take the single out of single-use polystyrene and make it a circular solution.

Now that the feasibility of recycling is proven, we are preparing the first recycling plants and upscaling towards larger volumes for our customers, together with our partners.

MATERIALITY ASSESSMENT

The circular economy is a topic of very high relevance to our stakeholders and us. It offers a solution to global and societal challenges, particularly marine litter and landfill of waste. Contributing to a circular economy will help improve our resource efficiency by better waste management. Our innovation efforts like depolymerisation will contribute to stopping landfill and reducing marine litter.

We are constantly striving to optimise and develop innovative products and applications. We work closely with our customers by offering services ranging from innovation workshops to development support and co-development projects to solve technical and performance challenges.

Our customers require safe products that are compliant with local and international regulations during handling and for their final applications. Thus, responsible product stewardship by complying with regulations and delivering safe, top-quality solutions to our customers is at the heart of our business.

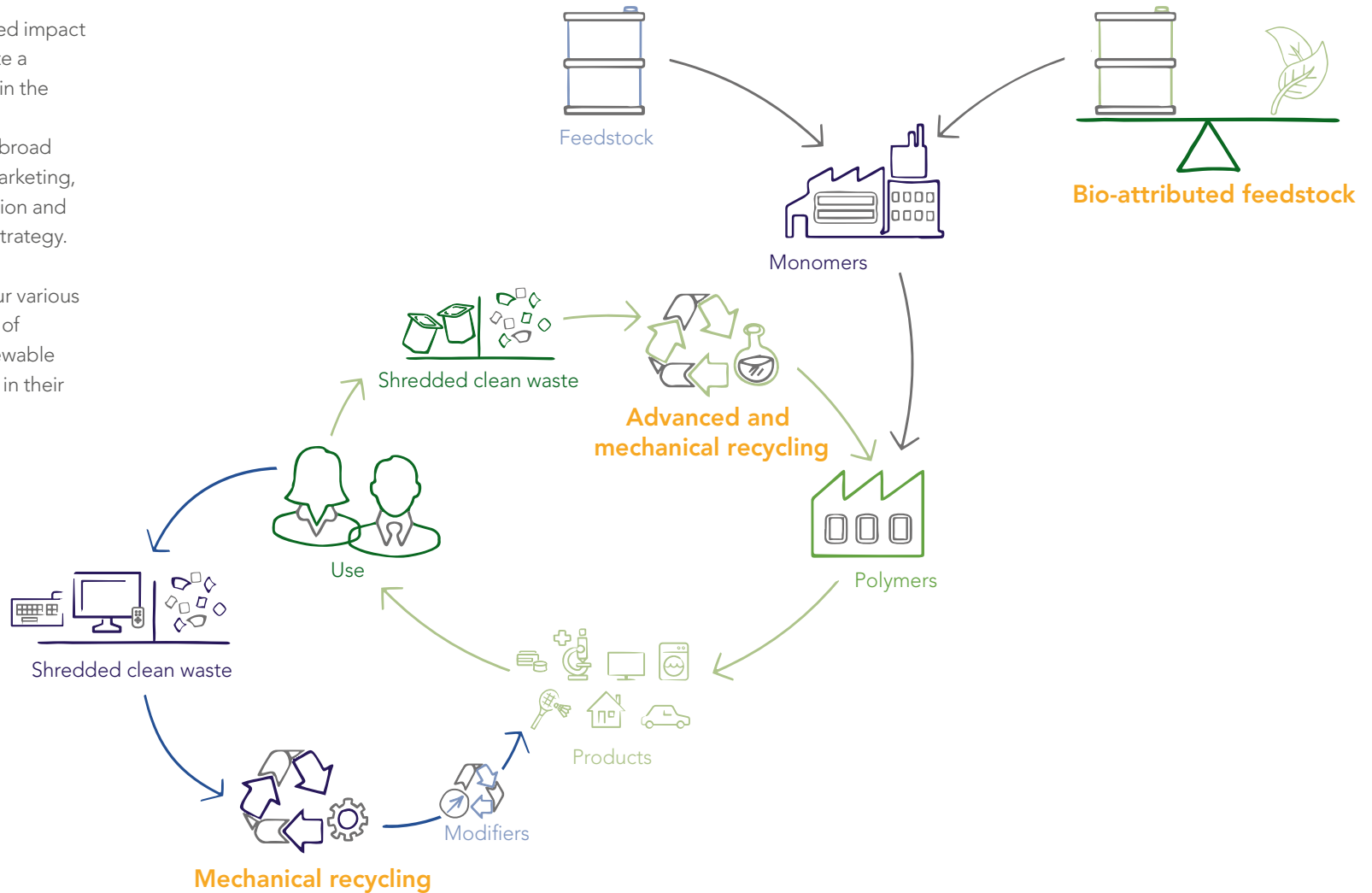


OUR STRATEGY FOR A CIRCULAR ECONOMY

Our aim is to create a positive, targeted impact and actively shift our industry to create a circular economy through our efforts in the upcoming years. Colleagues from all geographical regions representing a broad range of functions, including sales, marketing, technology, operations, R&D, innovation and strategy contributed to develop the strategy.

The strategy touches areas such as our various developments in recycling processes of styrenics and the introduction of renewable feedstock, supporting our customers in their path towards more circular products.

Our approach for a circular economy for styrenics





OUR PERFORMANCE

Key highlights

- Launch of **ECO** range of sustainable products
- Polystyrene produced from **100% recycled** monomer at lab-scale
- **ABS** grades with post-consumer **recycled** material introduced
- World's first specialty styrenics material made using **renewable feedstock** introduced
- Life cycle assessments conducted to calculate **carbon footprint** of polystyrene **depolymerisation**

Sustainability targets and actions

- **30% recycled polystyrene** in plastic packaging in Europe by 2025
| In progress
- Offer **recycled ABS** at commercial scale by 2020 | **Achieved**
- **Establish certification** for recycled and bio-attributed content in our product offerings by 2020
| **Achieved**

Changes in the legislative environment, increasing public pressure and demands from customers accelerate the need for us to find sustainable, circular solutions for our products and bring solutions to the market that support our customers to implement circularity as part of their products' end-of-life strategy.

We are committed to providing our customers with the best solutions for their business. In order to reinforce this commitment, in 2019, we launched **INEOS Styrolution ECO**, our new family of sustainable styrenics solutions. INEOS Styrolution ECO comprises products made from recycled post-consumer plastic waste as well as materials based on renewable feedstock. As this new product range matches the performance of our existing product portfolio, it will reduce our greenhouse gas footprint, reduce the amount of post-consumer waste going to landfill, support the recycling of post-consumer plastic waste, and help our customers to meet their sustainability targets. styrolution-eco.com

INEOS Styrolution ECO: A growing family of sustainable products



	PACKAGING	HOUSEHOLD	CONSTRUCTION	TOYS, SPORTS & LEISURE	HEALTHCARE	ELECTRONICS	AUTOMOTIVE
TERLURAN® ECO	✓	✓	✓	✓		✓	
STYROLUTION® PS ECO	✓	✓	✓	✓	✓		
NOVODUR® ECO NOVODUR® ECO HH	✓	✓	✓			✓	✓
STYROLUX® ECO	✓	✓	✓	✓	✓		
STYROFLEX® ECO	✓	✓	✓	✓	✓		



In 2019, as part of the INEOS Group, we defined global targets that are aligned with our material topics and key business needs. By 2025, we commit to deliver significant volumes of recycled polystyrene and use, on average, 30% recycled content in our polystyrene packaging products in Europe. This is a very ambitious target and to achieve this, mandatory separate collection of all plastics, the development of state-of-the-art sorting technologies to support sorting polystyrene from post-consumer waste, as well as the acceptance of depolymerisation and advanced recycling methods by the European Union is crucial.

With increased collection of plastics waste, including polystyrene (which is already happening in Belgium, France and Germany), the development and expansion of polystyrene sorting technologies, our joint efforts across the value chain and our active participation in cefic (the European Chemical Industry council), PlasticsEurope, the Circular Plastics Alliance, Styrenics Circular Solutions (SCS), the American Chemistry Council and the World Plastics Council, we are confident that we can deliver sustainable solutions to our customers.

Sustainability strategy team

Sustainability strategy lead
Johannes Musseleck
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End of life solutions
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Peter Weinkoetz
Bianca Wilhelmus

Business models & offerings
Yvonne van Veen
Marcela Villegas
Daniela Wallinda

RESPONSIBLE BUSINESS PRACTICES ACROSS OUR VALUE CHAIN

The complexity of a circular economy requires a collaborative approach. Currently we are embarking on several projects to develop sustainable solutions in our products' lifecycles, by engaging not only styrenics manufacturers but also stakeholders across our value chain, such as recyclers, brand owners and consumers.

Together with the European plastics industry, we have set a series of targets and initiatives called "Plastics 2030: PlasticsEurope's Voluntary Commitment to increasing circularity and resource efficiency," to achieve the goal of 100% reuse, recycling and recovery of all plastics packaging by 2040.

We are a founding member of a joint initiative of the styrenics industry called Styrenics Circular Solutions (SCS), which was set up as an independent legal entity in December 2018. Its primary aim is to increase the circularity of styrenics by engaging stakeholders across the styrenics value chain to identify, develop and industrialise new closed-loop recycling technologies and solutions including improved sorting capabilities for styrenics.

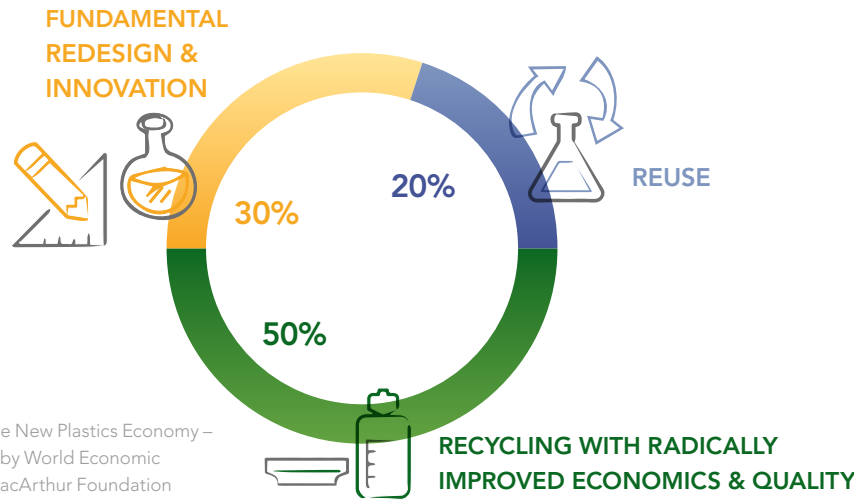
DRIVING SUSTAINABILITY THROUGH R&D AND INNOVATION

Our global R&D pipeline is the foundation for the future growth of INEOS Styrolution, as it comprises concepts for innovative future products, improved polymerisation processes and new applications. A key criteria in our innovation project prioritisation is the sustainability screening tool, which helps identifying the environmental impact of new products and applications throughout the full product life cycle.

Design for recycling

Creating a circular economy also includes designing products to increase circularity within our core business segments -- packaging, automotive, household and electronics. Therefore, we are actively looking at how we can design our material portfolio to enhance the recyclability of our products and help our customers design more recyclable products. Design for recycling can cover many areas such as:

- making sorting of material easier
- choosing materials that retain highest value after recycling
- making material recapture easier
- avoiding contaminating materials
- including recycled content in products



Adapted from: "The New Plastics Economy – Catalysing action" by World Economic Forum and Ellen MacArthur Foundation

In 2019, we conducted an internal workshop on design for recycling. The aim of the workshop was to understand what the latest trends were, find areas of opportunities for our products and applications, identify threats, and pinpoint where and how we could support our customers with more recyclable applications.

As a result of the workshop, we are now focusing on three main areas:

- application opportunities (e.g. single material yoghurt cups)
- application threats (e.g. shrink sleeve recyclability)
- process opportunities (e.g. co-injection of post-consumer recyclates)

We also attended a design sprint workshop, organised by the IDEO design agency, to develop select circular packaging solutions

with some of our customers. The design briefs that we worked on were:

- A mono material yoghurt cup to improve recapture of polystyrene for a more circular solution
- Meal delivery kits in a convenient, re-usable, and recyclable concept at end of life
- Improving packaging in the FMCG (fast-moving consumer goods) supply chain to reduce waste, improve convenience and increase circularity by using materials which are easy to recycle
- A large format mineral water delivery system designed for saving on usage of plastic water bottles
- A municipal water dispenser to motivate consumers to use refill concepts and at the same time giving an enjoyable drinking experience

REDUCING OUR ENVIRONMENTAL FOOTPRINT

Delivering circular solutions for our styrenics products helps to avoid littering, landfill and incineration. But that's not all: Our styrenics solutions also contribute to significant environmental savings during their life cycle due to the reduced use of fossil fuel and lower greenhouse gas emissions during recycling.

Life cycle assessments

In 2019, we undertook two life cycle assessments (LCA) to understand the impact of depolymerisation as a recycling technique. Our goal was to compare the environmental impact of polystyrene produced from recycled feedstock versus fossil feedstock. Both our ResolVe project and our internal GHG calculation project gave very promising results. The ResolVe study funded by the German government and in partnership with InVerTec predicted CO₂ equivalent emission savings of 37%. Our internal GHG study, based on our own plant engineering data and data provided by a recycling partner showed savings of 50%. These calculations were validated by Manchester University. Further reductions in GHG emission of up to another 40% to 50% are expected when modelling the conventional end-of-life scenarios of the fossil based materials, such as incineration or landfill.

Depolymerisation of polystyrene affords a lower impact feedstock than traditional fossil fuels. The simple one-step depolymerisation

process is far less energy-intensive than the conventional multi-step fossil feedstock production process. The avoidance of further fossil fuel use and waste incineration at the end of life are all benefits of this circular solution that help to keep our valuable materials in the value chain.

Another benefit of the depolymerisation process is that it produces styrene monomer identical to that of fossil-based styrene. With food-approval for depolymerisation, we foresee no need for downcycling and no limit to the number of product cycles we can supply. This allows us to target products that will create huge impact savings during their use phase. One prominent example is food packaging. By prolonging shelf life, we can ensure that carbon-intensive food production is not wasted before reaching consumers.

Both these studies rely on assumptions and the best available data. The assumptions will be validated during our upscaling activities. However, we foresee an increase in significant positive impact by capturing the valuable by-products in our plants. These initial findings are extremely promising, and we will continue our efforts investing in recycling technologies.

For more information, please read the chapter "Reducing our environmental footprint" >



OPTIMISING PRODUCT PERFORMANCE

Our styrenics products contribute to every facet of our daily lives due to their intrinsic and versatile properties. Styrenics are durable and weather-resistant, making them a longer-lasting alternative to other materials. They also have a low density and a high stiffness compared to other engineering plastics, which allows the manufacture of lightweight applications with reduced transportation costs and fuel emissions.

Here are some examples of our products used in applications.



YOGHURT CUPS MADE OF RECYCLED STYROLUTION® PS ECO 158N CR100 IN BLENDS WITH HIPS

Recycled polystyrene has the potential to become one of the best products for food-contact applications in terms of environmental impact as well as performance. We are now working together with leading-edge technology providers and partners across the value chain to deliver commercial-scale production of recycled yoghurt cups by 2022.

CUSTOMER CHALLENGE

Changes in the legislative environment and increasing public pressure and demands from customers, consumers and non-governmental organisations, reinforce the need for us to provide recycled and recyclable polystyrene products to our customers.

OUR SOLUTION

Polystyrene recycled via depolymerisation is a truly unique circular solution for food packaging, such as yoghurt cups. The advantage of this process is the generation of high-quality virgin polystyrene for food-related use. This recycled material is also recyclable, with no degradation in purity and performance even after being recycled multiple times. The depolymerisation process also has a much lower carbon footprint in comparison to conventional production processes.



SHRINK SLEEVES MADE OF STYROLUX® ECO

Styrolux® ECO is the world's first specialty styrenics material made using renewable feedstock. It uses fewer fossil resources and reduces GHG footprint by at least 74% when compared to styrenic polymers produced using fossil fuel. All renewable feedstock sources are certified by RSB and comply with the highest sustainability certification criteria.

CUSTOMER CHALLENGE

Our customers are looking for products made with renewable materials and with a reduced carbon footprint. The grades need to match the performance and have the same property profile as conventional materials. In addition, retaining already optimised and highly efficient infrastructure and processes are necessary.

OUR SOLUTION

Bio-attributed styrenics are made by mixing renewable and fossil feedstock during production. Our renewable feedstock is sourced from local household kitchen waste as well as Scandinavian wood waste. Styrolux® ECO grades are available in two versions: the B60, where 100% of the fossil-based styrene is replaced by bio-attributed styrene and the B30, where 50% of the fossil-based styrene is replaced by bio-attributed styrene.



COFFEE MACHINE MADE OF TERLURAN® ECO GP-22 MR70

Post-consumer-recycled ABS can now be used in visible applications such as housings due to its high surface quality and is available to our customers as a drop-in solution.

CUSTOMER CHALLENGE

The use of recycled ABS in household & electronics applications requires a consistent supply of high-quality materials. Our customers are looking for a reliable partner to deliver a drop-in solution, which can be used in existing production processes. And at the same time, they require a consistent supply of materials with conventional material specifications.

OUR SOLUTION

In collaboration with selected recycling partners, we have developed a black Terluran® ECO GP-22 MR70 grade. This grade, containing 70% post-consumer-recycled ABS, matches the current technical requirements of our standard grade, and provides a high surface quality. We can offer a consistent high-quality supply to our customers, first starting in Europe.



LOW-EMISSION AIR VENT PARTS MADE OF TERBLEND® S SG-02EF

The new Terblend® S SG-02EF is an 8% glass-fibre reinforced grade with superior heat resistance and dimensional stability. It provides a cost-effective matte surface finish that does not require painting.

CUSTOMER CHALLENGE

A premium car manufacturer was looking for a low-emission grade with a low-gloss finish and without the need to paint in order to optimise material savings. Moreover, automotive interior parts impose a particularly wide variety of requirements on the material used, such as high heat and scratch resistance.

OUR SOLUTION

The new Terblend® S SG-02EF is a low-emission and high-heat 8% GF PA/ ASA grade and features high heat resistance and excellent flow performance. The grade provides 5% material savings compared to conventional alternative painted PC/ ABS, due to reduced scrap rate.



INSULATION PANELS MADE OF STYROLUTION® PS 158 N/L

Styrolution® PS 158 N/L is a heat-resistant, rapid freezing general purpose grade. It is suitable for expanded sheets and films and helps to reduce heating energy and reduce CO₂ emissions.

CUSTOMER CHALLENGE

A manufacturer in the building and construction industry was looking for the best material to be used in insulation panels. The material needed to offer easy processing and high heat resistance.

OUR SOLUTION

Styrolution® PS 158 N/L is the ideal material for physically foamed high-quality applications, as it does not collapse or lose its rigidity once formed as panel.



EFFECTIVE RECYCLING STARTS WITH EFFECTIVE SORTING

The sorting of plastics waste is the essential step in the waste management of mixed plastics waste streams. Effective sorting and washing of plastics waste can divert this valuable resource from either incineration or landfill to deliver material with the required quality and specifications needed for recycling.

Polystyrene waste is already collected and sorted today, and we see new developments and sorting infrastructure being built. There is already enough polystyrene waste in the European waste market today. So, we can move ahead with our upscaled plants. The fact that polystyrene is easily sortable with existing sorting technologies such as near-infrared (NIR) is a clear advantage as there is sufficient affinity with sorters for this. Once sorted post-consumer waste gets valued as input for recycling plants, we believe that the enhanced ecological and economical value will drive further sorting of polystyrene.

Today, many stakeholders promote sorting of a limited set of polymers, which neither make it toward recycled content in products nor to food-grade applications. On the other hand, polystyrene, once collected and sorted, can be efficiently recycled, ensuring a full uptake into products as well as applications with the highest quality requirements.

The circular economy for plastics is not just about sorting and recycling a limited set of polymers. It is about each polymer that contributes to innovations and circular solutions that can be realised within a clear timeframe. We aim to make this vision clear to all stakeholders and regulators and build on the added value of all plastics that can contribute to circular solutions.

We are currently in talks with waste sorters and recyclers in order to ensure a consistent and high-quality supply of post-consumer material that we can recycle, and these collaborations have evolved to be extremely positive.

With new innovative NIR technology and state-of-the-art washing, high-quality recycled polystyrene is now technologically feasible, and we are currently aiming to get recycled polystyrene with a purity of 99.9% plus out of household waste. This will ensure a consistent and high-quality supply of material that can then be recycled.

We are also working with Styrenics Circular Solutions (SCS) to create a market pull away from incineration and landfill towards game-changing recycling solutions for styrenics by engaging with regional waste collection and sorting partners. SCS is building a close link between waste stream volumes of relevant quality and the respective high-tech recycling

processes, as well as developing the market for the recycled material. Trials with technology providers at specific sorting locations have proven the excellent sortability of styrenics out of mixed plastics waste and that all types and forms of styrenics (such as HIPS, GPPS, EPS, XPS) can be perfectly separated. This paves the way to have this new raw material available for recycling technologies.

As part of our efforts to bring high-quality recycled ABS to the market, we have identified various waste sources. This, in combination with state-of-the-art sorting technology and our manufacturing expertise can help us deliver a consistent, high quality of recycled

materials. The trials we have conducted with Austrian recycler bage plastics has shown a very consistent quality of ABS and we have seen promising results for colour and white sorting. We are also exploring a new sorting test with an international sorter of electronic waste.

In Asia, we analysed samples of recycled ABS and recycled polystyrene sourced from China, Malaysia, Indonesia and South Korea. We believe 70% of the recycled ABS samples tested have sufficient quality to produce Terluran® ECO with 50% and 70% recycled content.





POLYSTYRENE: MADE FOR RECYCLING

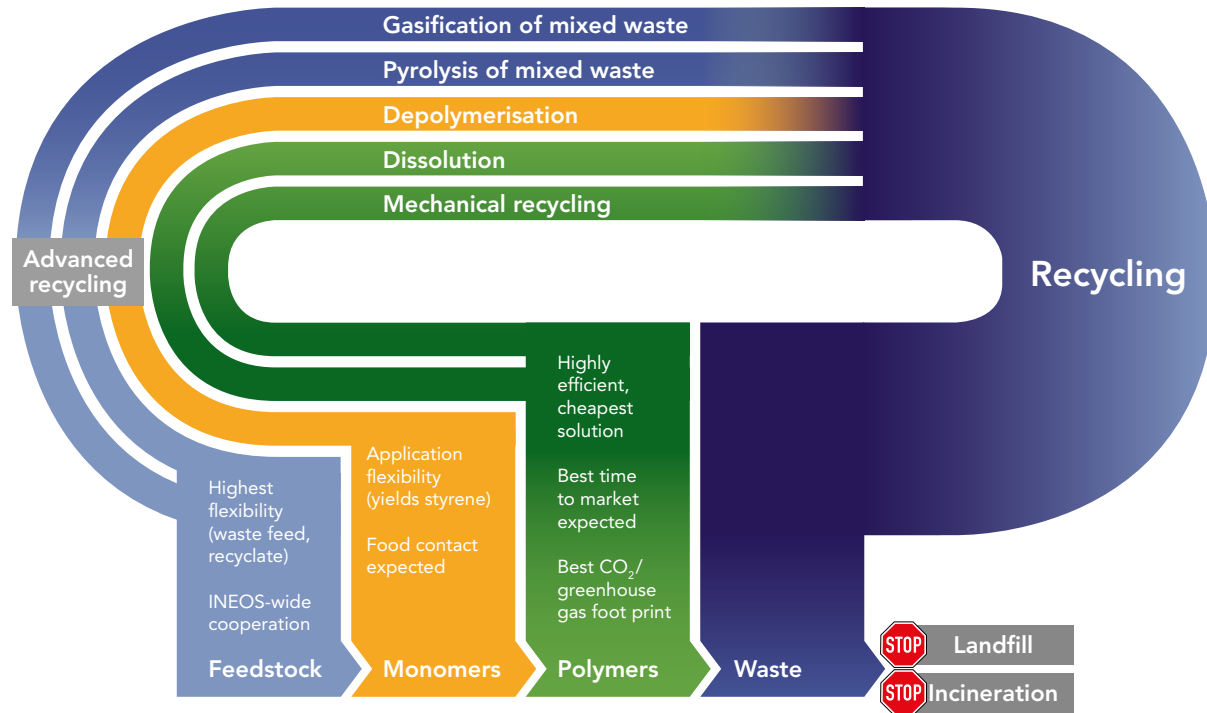
Polystyrene is not only a versatile, aesthetic and durable material, it is also one of the most recyclable polymers. Its unique properties allow it to be recycled using several different technologies from mechanical recycling to advanced recycling methods. These technologies offer recycled polystyrene with no sacrifice in properties, enabling food-contact applications and nearly infinite recycling cycles. Therefore, we are working on all these technologies in parallel to reach the recycling quota for polystyrene and offer this recycled material to our customers by 2025.

Mechanical recycling of polystyrene:

Mechanical recycling is a method by which plastic waste is physically processed back into pellets, without changing the basic structure of the material. With know-how from INEOS Styrolution, this method can generate new polymer grades that come very close to virgin polymer performance. This method of recycling polystyrene has a comparably high technology maturity, is the quickest available, and has the lowest carbon footprint.

Under the umbrella of SCS, we are working on mechanical recycling solutions for polystyrene with the ultimate target to use recycled polystyrene in food contact applications. SCS has successfully demonstrated high-purity recyclability of polystyrene via mechanical recycling, proving the viability of achieving purity levels that exceed 99.9%. With the

Recycling technologies for polystyrene



inclusion of an additional ‘super-cleaning’ process step, we believe that mechanical recycling of polystyrene will have the potential to enable food-grade approval.

We are in the final stage of the so-called challenge tests to demonstrate that the super cleaning process works as expected. In cooperation with the Fraunhofer Institute, we are working towards for the approval of mechanically recycled polystyrene as a food-contact material.

Dissolution: Dissolution purifies polystyrene by multiple washing steps including solvent extraction, which eliminates or reduces impurities. This has been established by the PolystyreneLoop solution based on Creasolv® technology. This reduces or eliminates legacy additives and impurities to create a valuable source of polystyrene for construction applications. Dissolution, being developed by Montreal-based technology company, is showing results of high yields of GPPS as well HIPS.

Depolymerisation: Through this advanced recycling method, polystyrene waste is converted back to its monomer for use in polymerisation processing. The styrene monomer produced from depolymerisation is equivalent to virgin styrene monomer produced by fossil fuels.

Depolymerisation is a straightforward recycling technology that works with selected polymers such as polystyrene. This technology avoids multiple processing steps in



comparison to virgin material produced from fossil fuel. Thus, it uses fewer resources, resulting in a significantly lower greenhouse gas footprint. Due the fact that depolymerisation breaks down polymer chains into molecules which are used to produce virgin polymers again, we can reach the same qualities and applications as with virgin styrene.

Pyrolysis of mixed waste: In this method, plastic waste is converted to an oil via a thermal cracking process. The resulting oil is further purified and processed, used as feedstock in steam crackers to produce the base molecules (ethylene, propylene, butadiene, benzene) for polymer production. This recycling method is developing rapidly and is being led by polyolefin producers. As a styrenics company, we highly welcome these developments as they foster the circularity of plastics. This method also provides an add-on solution by providing base molecules for the production of styrene styrenics co-polymers.

As an INEOS business, we benefit from collaboration within the INEOS group, particularly INEOS Olefins & Polymers, which is currently collaborating on a new advanced plastics recycling facility with Plastics Energy.

Gasification: Although gasification of mixed plastics waste is still in its infancy in Europe, there are some clear pilot to commercial-scale plants up and running in North America. The potential and benefits of this method are

twofold: it provides large-scale recycling solutions from mixed plastics waste (amongst other sources such as domestic waste and bio-waste) and breaks it down to syngas. After purification, this syngas is used as a carbon source for synthesis of chemicals such as methanol, ethanol or oils, thus recovering the carbon as a product.

Gasification offers the highest flexibility and scalability in terms of waste, feed and recycle. However, it requires significant investments and development, for which joined industry collaboration will be needed.

All the technologies mentioned above complement each other and will be needed depending on the quality of input waste and the requirements of the final products, with each technology having a different environmental impact. Therefore, we are actively pursuing the development of all these technologies in parallel, with a priority on those uniquely suited for polystyrene.

WORKING TOGETHER TO DEVELOP SOLUTIONS

We are working with several leading-edge technology providers in North America and Europe to further advance a circular economy for polystyrene. We combine state-of-the-art technologies from technology providers such as Agilyx, Indaver, GreenMantra and Pyrowave with our own manufacturing expertise to convert waste polystyrene back into feedstock.

We focus on technology developers and leading recycling companies that can support us in developing short term to market recycling plants and fast upscaling with additional units. In the meantime, we need to pursue and develop second-generation technologies with better scalability and enhanced yields for the next set of recycling plants.

We assess potential future technologies for polystyrene recycling jointly with research institutions, and technology developers, while prioritising our short term to market solutions.

We currently invest in various large recycling projects:

Our facility in Channahon, Illinois, will use proprietary technology from Agilyx, a technology leader that focuses on converting waste polystyrene via depolymerisation. Agilyx has already confirmed the availability of sufficient polystyrene waste to be used as feedstock, and believes that this plant will dramatically increase recycling rates in the greater Chicago area. The plant will be capable of recycling up to 100 tonnes of polystyrene waste per day after its scheduled completion in 2023.

Another activity is being pursued with Indaver, a leading European waste management company with large-scale treatment facilities in the port of Antwerp, to build a demo-plant for advanced recycling, where polystyrene waste will be recycled to purified styrene. The

demo-installation in the port of Antwerp, with a recycling capacity of 15,000 tonnes a year and will be operational in 2022.

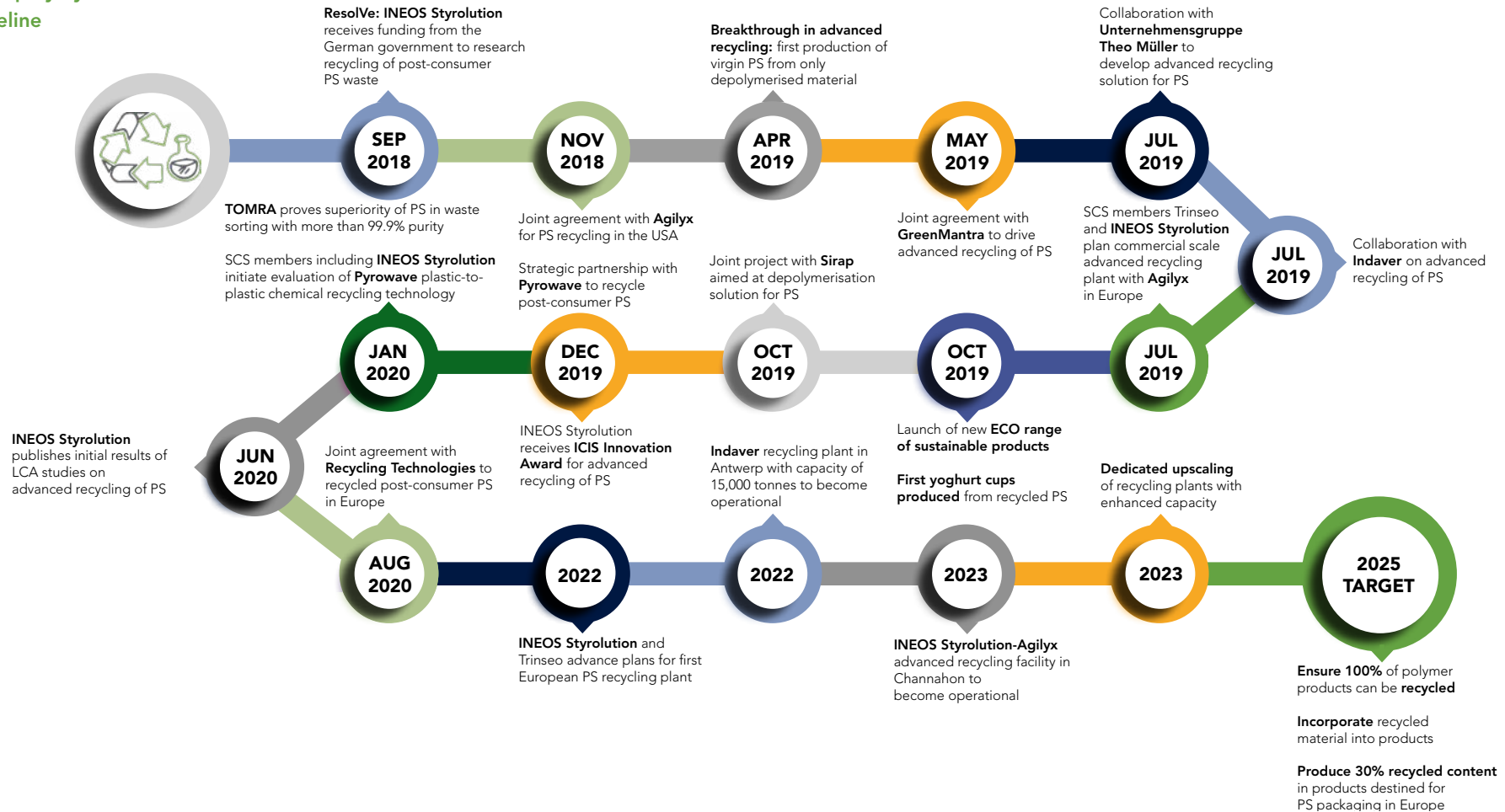
Besides these two main developments that will deliver the shortest term to market, we also have other developments under way. We are undertaking feasibility studies for investments as a joint effort with another large styrenics producer, and these are progressing at a fast pace.

Beyond our investments in polystyrene recycling plants, we are aware that several parameters such as yield, availability of polystyrene waste, and recycling of by-products will enhance the competitiveness of our future plants. Therefore, we are focusing on in-depth R&D of recycling technologies.

For example, Project ResolVe, led by our global R&D team, was granted a funding from the German Federal Ministry of Education and Research (BMBF) to explore the recycling of polystyrene. This project, which ended this year, concluded that depolymerisation is a very appropriate recycling solution for polystyrene in combination with distillation of the output for further polymerisation. It was executed with contributions from INEOS in Cologne, Germany, two institutes of the University of Aachen (RWTH) – the Institute for Processing and Recycling (Institut für Aufbereitung und Recycling, I.A.R.) and the Institute of Plastics Processing (Institut für Kunststoffverarbeitung, IKV) – as well as Neue Materialien Bayreuth GmbH.



Ensuring recycled polystyrene by 2025: our timeline



POSITIVE FEEDBACK FROM CUSTOMERS

We have already provided some batches of recycled polystyrene to selected customers for testing. Sirap, an international leader of food-packaging containers, is working with us to be the first-mover to use recycled polystyrene in the food-packaging sector. First samples of recycled polystyrene at lab-scale have already been analysed.

Unternehmensgruppe Theo Müller, Germany's largest privately-held dairy business received some test samples from us and are pleased with the results. The dairy company believes that this test material has the potential to become one of the best products in terms of environmental impact as well as performance. We are now working together to develop a solution that aims to deliver commercial-scale production of recycled yoghurt cups by 2022.



MAXIMISING THE POTENTIAL OF MECHANICAL RECYCLING

Since early 2018, we have been exploring mechanical recycling to develop a lean portfolio of basic grades for our standard applications. In 2019, we introduced Terluran® ECO, our first standard ABS grades with post-consumer recycled material. The two new grades Terluran® ECO GP-22 MR50 and Terluran® ECO GP-22 MR70 contain 50 and 70 percent of recycled post-consumer waste electrical and electronic equipment (WEEE), respectively. The materials, which have a high-gloss surface finish, are available in black and grey, and are aimed at household and electronics applications. Several blue-chip companies have already started to evaluate the new material and plan first applications to enter the market soon.

These recycled ABS solutions match the mechanical property profile of our virgin GP ABS grades and can be used as a drop-in solution by our customers.

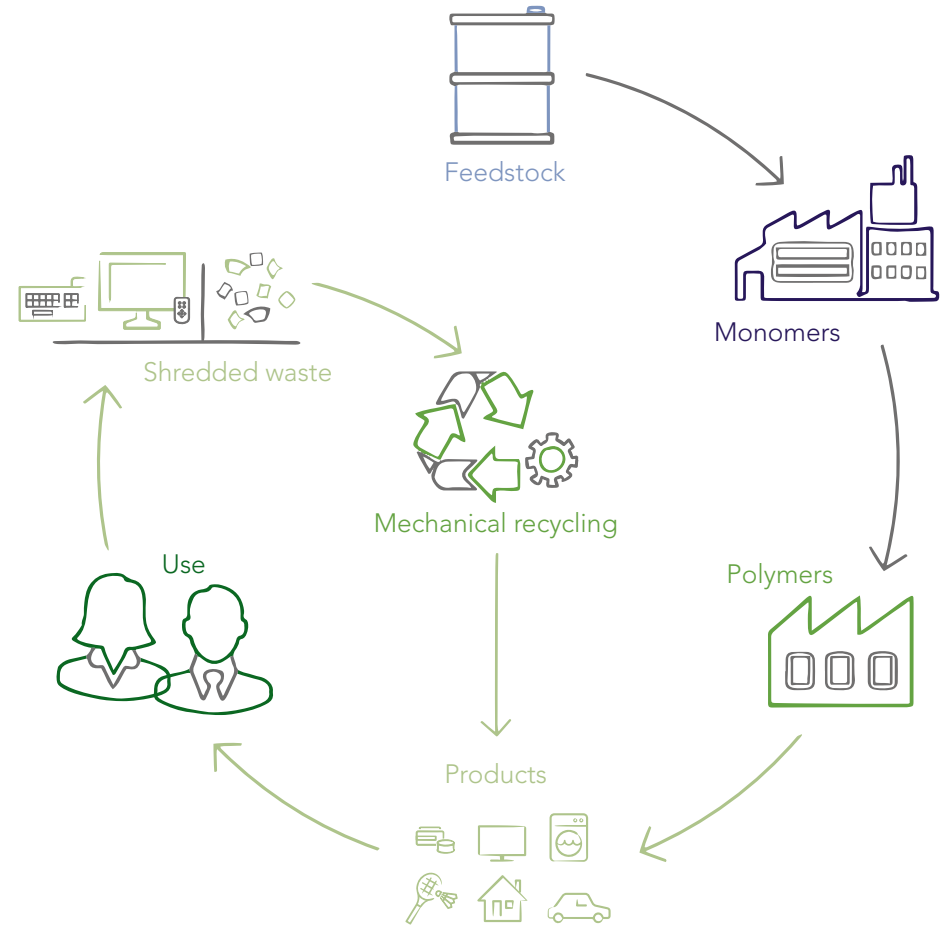
We are now entering into collaborations with select recyclers to scale up production of the newly developed ABS recycled grades. The first partnership was signed with bage plastics, an Austrian WEEE recycling company in 2019 to produce high-quality ABS grades with up to 70% recycled content at commercial scale. We plan to integrate bage plastics' post-consumer recycled electrical and electronic waste into state-of-the-art recycling ABS formulations.

We plan to offer Terluran® ECO in Americas as well as start manufacturing Terluran® ECO in Asia from locally sourced post-consumer recycled ABS.

We are developing another recycled ABS product, Novodur® ECO, in white as well as colour options. In addition to that are we developing Novodur® High Heat and polycarbonate blends. Test materials are currently being sampled by customers and we aim to make this product available early next year.

Mechanical recycling is the best available and proven technology to reuse end-of-life plastic waste on a short to medium term, and is currently the most feasible option for ABS. As this process is less energy-intensive, it has a much lower carbon footprint in comparison to conventional production processes and will reduce the amount of waste that ends up in landfill and incineration.

Mechanical recycling: a proven technology that works for various styrenics polymers



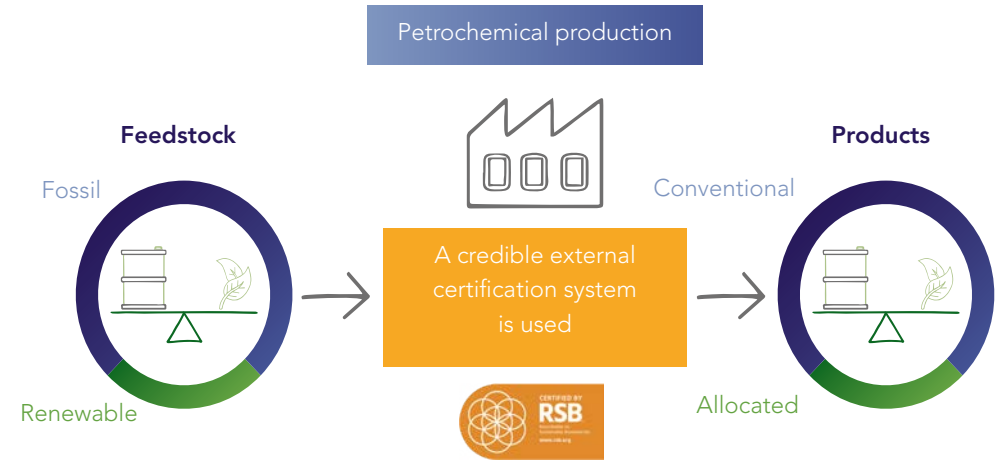


USING RENEWABLE RESOURCES AS A RAW MATERIAL

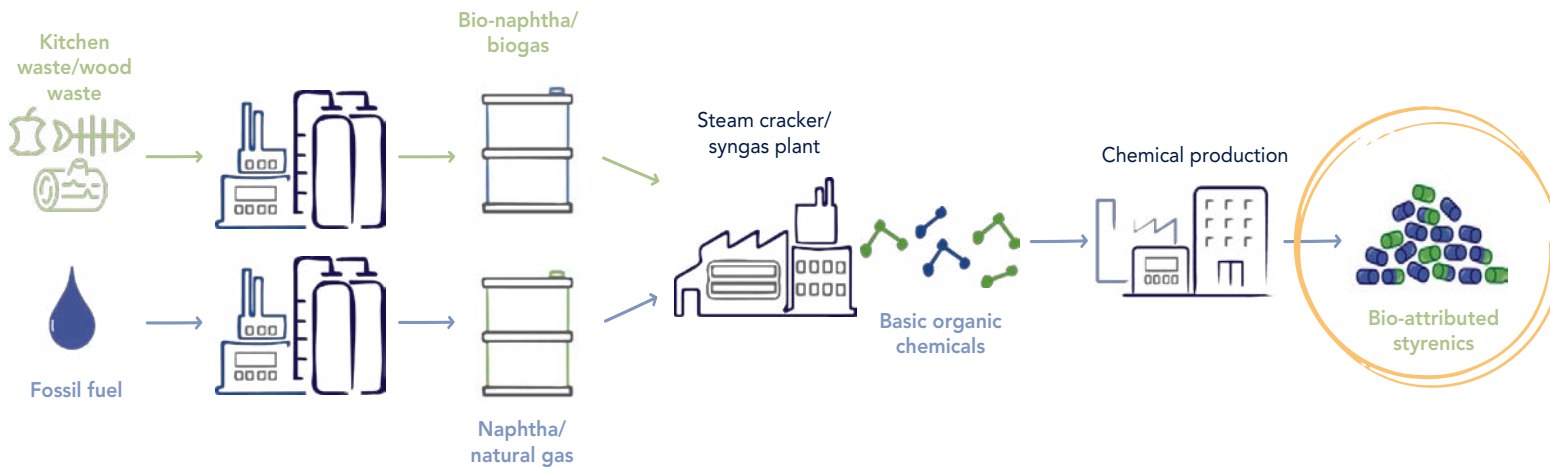
Since 2019, we have been working on offering the integration of renewable feedstock as a replacement for fossil fuel in upstream existing petrochemical installations. After a rigorous audit process, we launched Styrolux® ECO, the world's first specialty styrenics material made using renewable feedstock within the value chain. When compared to styrenic polymers produced using fossil fuel, GHG savings for bio-attribution range from 70% to 100%, depending on the sourcing and on the polymer.

Our renewable feedstock is sourced from several types of bio-feedstock (amongst by-products from biofuel production) which comply with the highest sustainability criteria and which significantly save GHG sources. Therefore, the bio feedstock does not compete with food and does not compete with land use. The renewable feedstock sources are certified by the Roundtable for Sustainable Biomaterials (RSB) to assess that they are managed in accordance with their sustainability criteria.

Bio-attributed feedstock: a drop-in solution that can be used for our complete portfolio



How bio-attribution works



The variable content of bio-feedstock in the final product is attributed as a percentage of production.

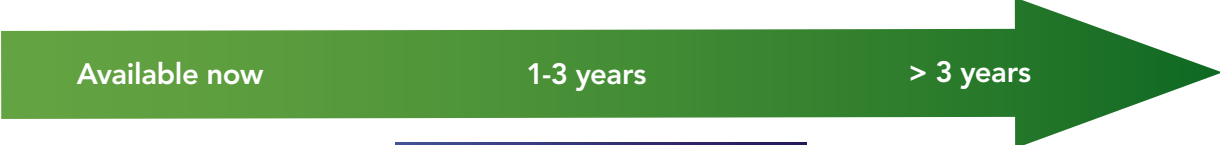


Following an extensive audit of our production site in Antwerp in 2019, RSB fully certified that the processing of the bio-based feedstock along our entire supply chain is socially responsible, environmentally sustainable and credibly sourced, ensuring that our operations are in line with the highest legal, environmental, social and management requirements. INEOS Styrolution is now a member of RSB.

For our customers, this bio-attributed approach enables an easy transition from fossil to renewables as it offers a drop-in solution. As we operate in large-scale manufacturing sites and the bio-feedstock is mixed with fossil feedstock, we cannot define where and in which quantities the bio-feedstock is present in our end products. However, we can ensure sustainable processing and in that way significantly reduce GHG emissions along the value chain and avoid the use of fossil fuel.

We also reduce the GHG footprint in our customer's supply chain, and for them there is no compromise in performance, no product development necessary, no need to adapt technology and no new regulatory approvals needed. As this approach allows for the creation of sustainable supply chains, while retaining already optimised and highly efficient infrastructure and processes, we believe this attribution method will be suitable for our advanced recycling activities as well.

Overview and timeline of our sustainable product offerings

			
	Available now	1-3 years	> 3 years
Polystyrene		Styrolution® PS ECO: food grade PS from depolymerisation High purity mechanically recycled grades with virgin-like performance	
ABS	Terluran® ECO: Standard ABS grades with virgin-like performance	Recycled ABS grades in a wide colour and performance range	Grades based on styrene from PS depolymerisation
Transparent specialties	Styrolux® ECO & Styroflex® ECO: Certified transparent products based on bio-attributed feedstock	Luran® ECO & NAS® ECO: Certified transparent products based on bio-attributed feedstock	Grades based on styrene from PS depolymerisation and other monomers from recycling
Opaque specialties	Novodur® ECO* & Novodur® ECO HH*: Pre-coloured ABS grades with mechanically recycled content providing virgin-like performance	Terblend N® ECO: Pre-coloured ABS/ PA blends with mechanically recycled content providing virgin-like performance	Grades based on styrene from PS depolymerisation and other monomers from recycling

*available now as development grades



PLASTICS FOR THE PLANET, PLASTICS FOR PEOPLE

Plastics can contribute to a better and safer planet and thus play a key role in the shift to a circular, low-carbon economy. Plastics have always benefited people, and it has become even more essential during a pandemic where there are enhanced health concerns and medical needs. It is fundamental for us as a plastics producer to contribute to the safety and enhanced medical care of people.

COMBATING COVID-19 WITH OUR PRODUCTS

During this unprecedented global pandemic, we are successfully helping our customers find solutions to tackle COVID-19. INEOS Styrolution is recognised as a “business essential” company integral to the healthcare industry supply chain.

We supply materials that are used in a variety of applications across various market sub-segments. These include labware, respiratory and drug delivery, IV and fluid transfer, mobile/ digital health, surgical equipment, and medical packaging. Our team has successfully partnered with many of our customers to answer the global outcry for much-needed medical supplies, be it the diagnosis of the disease (blood analysis kits), treatment of patients (ventilators, IV sets), or personal protective equipment (face shields).

Some examples include, but are not limited to: K-Resin® and polystyrene from our Yeosu and Ulsan facilities are utilised in different types of COVID-19 detection kits.

Products such as Terlurux® HD and Novodur® HD made in Ludwigshafen/ Schwarzheide and Cologne, respectively, are being used in the production of various respiratory and oxygen delivery equipment.

Addressing the shortages of PPE (personal protective equipment) for frontline healthcare providers, Styrolux® from Altamira, polystyrene from Channahon, and Lustran® ABS from Addyston have been evaluated for suitability in face shields and respirators.

Styrolux® from Antwerp and NAS® XC from Decatur are being used in the production of social distancing barriers that are now

commonly found in supermarkets, office spaces, and other public venues.

Terluran® ABS grades produced from each of our sites have been used around the world in applications such as safety goggles, paper towel dispensers, hand sanitiser housings, and testing devices.

We have supported many of our “non-healthcare” customers (from automotive, household, extrusion segments) who notified us of their intention to start producing medical equipment. With our expansive global reach, extensive technical knowledge, and in-depth insight of various industries, we have helped guide many of these customers, who may have no experience producing medical devices, in the proper material selection and processing for the targeted applications.



RESPONSIBLE PRODUCT STEWARDSHIP

Ensuring compliance with various national and international regulations is an ongoing obligation and forms an integral part of our operations. We make sure that our styrenics and raw materials comply with legal requirements in all the regions and industries we serve. For example, in the food packaging industry, our products meet strict standards, including those set by the European Food Safety Authority (EFSA) and the U.S. Food and Drug Administration (FDA).

In order to provide customer-centric regulatory support and proactively address global regulatory and product safety trends, we rely on our global network of internal and external experts.

To ensure product safety and to give our customers a competitive edge, we offer a comprehensive range of services. Via an online portal, we provide important information – such as safety data sheets in various languages, technical data sheets and regulatory documents. In addition, a team of dedicated professionals is on hand to help our customers meet strict international regulatory requirements.

To gain a broader market overview, assess product quality and minimise risks, we also work closely with industry associations, such as PlasticsEurope and the U.S. Styrene

Information & Research Center. These partnerships help us better understand current and future regulatory developments, for instance, by giving us access to studies on feedstock and product safety. Our certified quality management system ensures the consistent delivery of high-quality products around the world, and in combination with regulatory affairs, assists in building and maintaining the trust of our customers. The system is based on best practices and international standards, such as ISO 9001 and ISO 14001.

PRECAUTIONARY PRINCIPLE

As a manufacturer committed to the long-term sustainability of our business, we manage the use of our chemicals in a responsible manner by applying the precautionary principle. This principle is an inherent part of our approach to risk assessment and risk management. We are familiar with and closely scrutinise our substances' properties, establish guidelines for safe handling and processing and will continuously review and update our criteria and guidelines for the development of new products. In all our plants, the precautionary principle is an integral component in our management of change process, requiring a documented risk assessment for all process changes.

PRODUCT RESPONSIBILITY

We constantly monitor international regulations as they develop: to anticipate requirements, improve our products and ensure compliance in all markets in which we operate.

For example, in applying global inventory management, we have implemented automated tools such as the Substance Volume Tracking Tool for REACH to avoid non-compliance cases.

We make use of an eShop on our website to provide up-to-date information to our customers on product stewardship, providing a wide range of information that can be downloaded at any time to assist customers in using our products effectively and safely. We provide over 3,000 downloadable safety data sheets directly on our website that cover our large range of products. They are provided in 32 languages covering the 40 different countries in which those products are sold.

For customers who register on our website, around 265 regulatory documents are available for download, including regulations on food contact, RoHS*, REACH**, and SVHC***. Customers that download regulatory documents receive notification of updates. We constantly review and improve

our website services in order to make it more user-friendly for our customers.

Concerning “conflict minerals” as defined by the Securities and Exchange Commission (SEC), i.e. cassiterite, columbite-tantalite, gold, wolframite and their derivatives, these have not been intentionally added as ingredients in the manufacture of our products and, to the best of our knowledge, are not known to be present in the final products.

* RoHS: Restriction of Hazardous Substances Directive
** REACH: EU regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals
*** SVHC: Substance of very high concern

ENSURING SAFE AND RESOURCE-EFFICIENT OPERATIONS



UPHOLDING SAFETY AS OUR CORE VALUE >

REDUCING OUR ENVIRONMENTAL FOOTPRINT >



UPHOLDING SAFETY AS OUR CORE VALUE

Our employees, contractors and on-site logistics personnel are our most valuable asset, which is why workplace safety is and remains our core value. For us, incident-free operation is our objective.

We have established a SHE culture of open dialogue, coaching and trust that reinforces our SHE performance. We aim to minimise the impact our facilities have on local communities and local environments. This means working in close partnership with community groups and key stakeholders to ensure that we are a responsible neighbour and partner.

OUR APPROACH

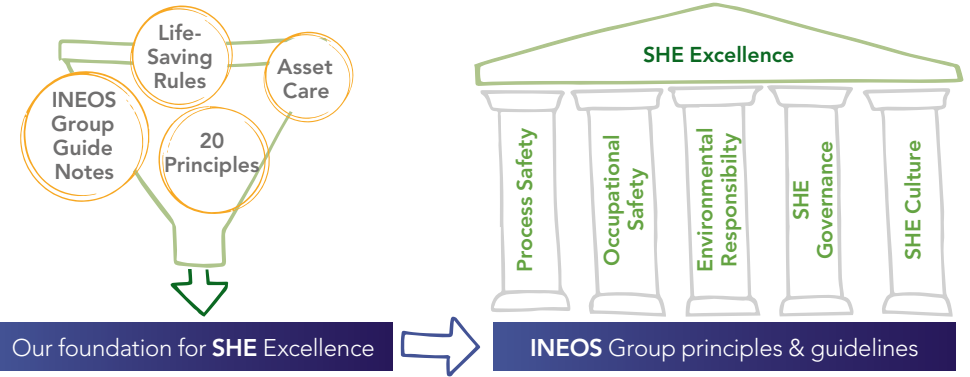
INEOS Styrolution is convinced that being a market leader goes hand-in-hand with an outstanding safety record and that all accidents are preventable. We take our responsibility for safety, health and environment (SHE) very seriously and are fully committed to delivering a continually improving performance across all our operations.

Our commitment to safety starts at the top, with the management board being responsible for our safety performance. However, it is the responsibility of everyone at INEOS Styrolution to ensure the highest standards of safety and health in everything that we do every day.

We strive to meet, and where feasible, exceed strict safety and health performance targets. We are transparent about our performance and publish our results locally and nationally, as required. According to our materiality analysis conducted in 2017, out of all 16 key topics, workplace safety was rated as being of highest importance to our internal and external stakeholders.

OUR GLOBAL SHE EXCELLENCE PROGRAMME

Our global SHE Excellence programme was introduced in early 2012 to establish high SHE standards and management systems. By 2016, we integrated the INEOS Group's SHE principles, guidelines and lifesaving rules within our SHE Excellence programme.



OUR SAFETY PRINCIPLES

We focus our attention on safety in the processes we apply and the behaviours we expect. In alignment with all other INEOS Group businesses, we follow two sets of ten key safety principles that have become our 20 principles.

These 20 principles form the foundation of our SHE Excellence programme, and define what is expected of all our employees, contractors and businesses on a day-to-day basis.

For more information on our 20 Principles, please visit our website [\(S\)](#)

Regular training activities, auditing and the exchange of best practices across all regions and sites keep safety at the forefront of operations. We utilise a rigorous internal audit protocol to ensure our sites continue the journey of SHE Excellence. Starting in 2018, we further increased the rigour of our internal

standards by adapting the protocol to ensure that best practices identified during past audit cycles are now the normal standard of today's protocol. Audits are led by trained members within our Operational Leadership team, accompanied by an Internal Audit team knowledgeable in SHE and the operational aspects of our business. During such audits, findings related to serious deviations are resolved by immediate corrective actions. Findings related to minor deviations are integrated into the site's annual SHE improvement plan. These audit processes take place according to a rolling three-year schedule.

In 2019, our ten behavioural safety principles were audited at all our sites. In 2020, we will work on improvements identified through the audit recommendations.



OUR PERFORMANCE

Key highlights

- Total case injury rate (TCIR) of 0.12 compared to an overall target of 0.25

Sustainability targets

- Continuous improvement** of our company's safety performance
- Annual total case injury rate (TCIR) of 0.25 for 2020

We further strive for continuous improvement of our safety performance. An example of this has been the recent development and implementation of INEOS Styrolution Guide Notes. These standards, which require our operations to utilise best practices, focuses on the prevention of our most common incidents. These include standards for working at height, pelletiser safety, prevention of extruder fires, and prevention of dropped objects.

Our overall safety target for 2020 includes a target TCIR of 0.25 for our employees as well as our contractors.

SHE EXCELLENCE AWARDS

We established the SHE Excellence awards in 2018 to reward sites and offices that have

made significant contributions to sustainable safety, health and environmental compliance.

In 2020, the regional SHE Excellence award winners for Asia-Pacific, EMEA and the Americas are our manufacturing sites in Yeosu, Antwerp (styrene monomer plant), and Decatur. Out of these three, Decatur was recognised as the global winner of the SHE Excellence award.

INJURIES, OCCUPATIONAL DISEASES, LOST DAYS AND WORK-RELATED FATALITIES

INEOS Styrolution reports all safety matters to its management board within 24 hours. All incidents are reviewed by the board on a monthly basis. In terms of key parameters, we focus on personal injuries, environmental performance, non-compliance with regulations, asset integrity, loss of containment, technical inspections, other high-potential incidents or near misses and behavioural-based safety observations (BBSOs). In 2019, 100% of our locations had safety committees comprising both management and wage employees.

Last year, we saw an overall year-on-year improvement in our in-plant operations and safety performance. The number of injuries that resulted in employees or contractors having OSHA recordable cases was reduced by 38% as indicated in the total case injury rate

(TCIR) of 0.12 vs 0.20 in 2018. The number of injury cases that resulted in employees and contractors being away from work for one or more days remained the same, as reflected in the lost time injury rate (LTIR).

The DART rate measures how many workplace injuries and illnesses require employees to miss work, perform restricted work activities or transfer to another job within a calendar year. DART focuses on more severe injuries and illness that may result in life-changing events, similar to LTIR. We have steadily reduced our DART rate since 2015.

LOSS OF CONTAINMENT

We are required to report any loss of containment (LOC) events that occur at our production sites that are above release thresholds equal to 1/10th the U.S. EPA reportable quantity (RQ) threshold, as a process safety and environmental impact indicator. Our performance trend indicates

LOC data by number or occurrences across global business since 2015

YEAR	LOSS OF CONTAINMENT (LOC)
2015	16
2016	15
2017	6
2018	5
2019	8

that we have halved the number of LOC events since 2015.

TRANSPORTATION AND DISTRIBUTION SAFETY

In the interest of improving transportation and distribution safety (TDS), we monitor and track logistics safety incidents involving our products and raw materials. Most of these occurrences are the responsibility of our carriers. However, we understand that our selection of carriers that demonstrate high performance in SHE provides reliable material delivery to our operations and customers, as well as ensures public safety in the communities where we do business. Major transportation incidents are reported according to the criteria below.

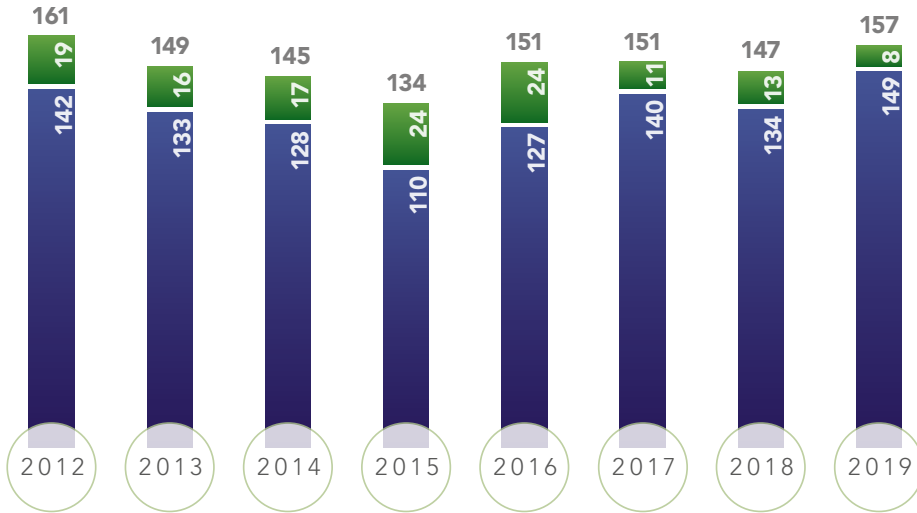
Criteria per incident type

INCIDENT TYPE	CRITERIA
Injury incident	Death or >3 days absence from work
Spillage/leakage	> 50 kg ADR transport category 0 & 1 > 333 kg ADR transport category 2 > 1,000 kg ADR transport category 3 & 4
Property damage	> 50,000 euros
Public disruption	Impact of more than 1 hour
Media coverage	National media coverage



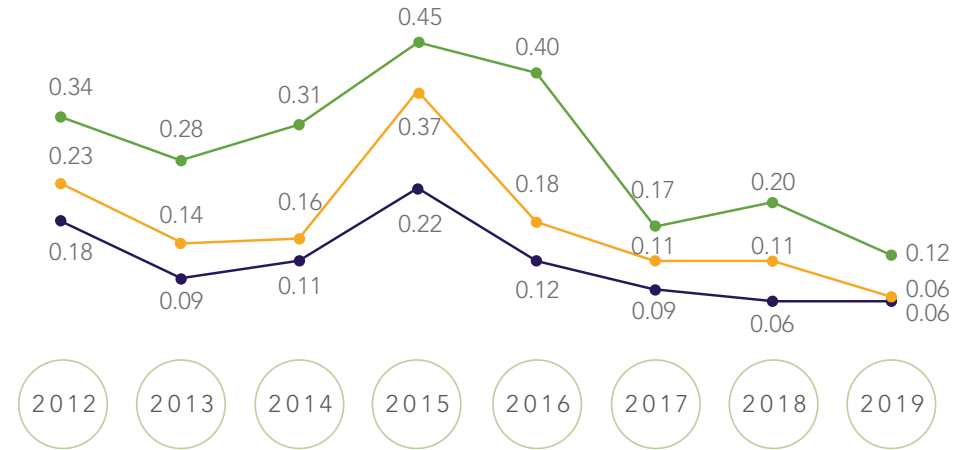
Total number of injuries

First aid cases Recordable cases



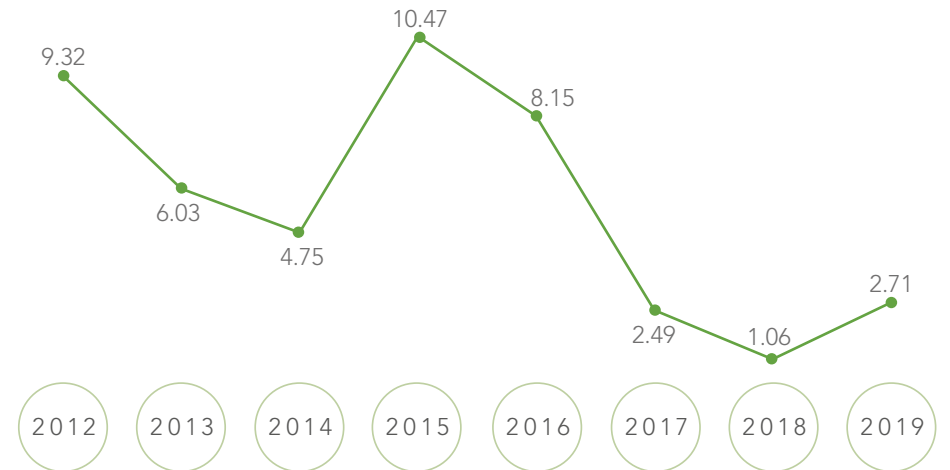
Performance trend

TCIR LTIR DART



- TCIR** Total case injury rate per 200,000 work hours (includes employees and contractors)
- LTIR** Lost time injury rate per 200,000 work hours (includes employees and contractors)
- DART** Rate of injury cases involving days away or restricted transfer per 200,000 work hours (includes employees and contractors)
- Severity rate** Reflects the number of days away from work per 200,000 work hours (includes employees and contractors)

Severity rate





COMBATING COVID-19: ENSURING SAFE AND RELIABLE OPERATIONS

As the COVID-19 pandemic spreads across countries and continents, manufacturing companies such as us are faced with many challenges.

To curtail the spread of the coronavirus, we acted swiftly to protect employees and immediately implemented strict hygiene measures as well as social distancing procedures. We put in place a set of 10 workplace rules for all employees to follow when working at our offices and production sites. We also developed and implemented detailed workplace readiness essentials (based on Cushman & Wakefield’s guide to reopening workplaces).

Despite the uncertainty in the supply of raw materials and demand for our products, our site leaders guided their teams while following strict hygiene measures as well as social distancing procedures. The teams demonstrated flexibility, adjusting the production rate at our plants to meet the demands of our customers.

We had an average of 35% of our workforce present at each site, thus ensuring that our assets kept running, without going under the minimum safety staffing to run them. The rest of the employees continued to work from home. This helped curtail the number of COVID-19 cases within the company.

At the same time, we remained focused on safety as our core value: our OSHA rate was 0.13 (YTD May 2020), which is our best-ever safety performance.

With the tremendous support of our workforce, all our plants have been in operation since March 2020, with the exception of our plants in India where the government had instructed us to shut down for a period of time.

Our construction site in Bayport, Texas, USA, and our project in Ningbo, China, faced minimal disruption with construction and engineering rates as expected and on track.

Our operations in China, which were the first to undergo these special measures and are now back to full staffing and full production.

The return to offices and production sites has been gradual, taking into account strict hygiene measures as well as social distancing procedures. This is being monitored on a daily basis in case additional measures need to be implemented. In addition, we require mandatory respiration protection with several disinfectant and hand sanitiser stations installed at several locations in our sites and offices.

THE SAFE SIX



PREPARE THE BUILDING



PREPARE THE WORKFORCE



CONTROL ACCESS



SOCIAL DISTANCING PLAN



REDUCE TOUCH POINTS



COMMUNICATE FOR CONFIDENCE

Visual adapted from: Cushman & Wakefield’s guide to reopening workplaces.



REDUCING OUR ENVIRONMENTAL FOOTPRINT

Operating responsibly is deeply embedded in our corporate values. We are strongly committed to using resources efficiently and safeguarding the environment.

OUR APPROACH

As a leading manufacturer for polystyrene and styrenics specialties globally, we aim to use available resources efficiently and reduce our environmental footprint.

Complete compliance with local and national environmental legislation is mandatory for our operations. We strive to continually improve our operations as well as our sustainability performance by following the key drivers of our environmental policy:

- **Reduction in energy use and greenhouse gas emissions:** Striving to continually optimise the energy efficiency of our technology and operations
- **Resource efficiency, including scrap reduction and waste management:** Efficiently using raw materials, including reuse, recycling and recovery through optimisation of our processes
- **Efficient use of water:** Reducing the use of water where possible and optimising the water efficiency of our operations:

- **Reduction of air emissions and wastewater discharge:** prevention of accidental emissions through advanced process control and arigorous procedural approach
- **Prevention of pellet loss:** Avoid the spillage of pellets into the environment through preventative and mitigation measures as well as monitoring at our production sites and during transportation
- **Transparency and open communication on our environmental performance with stakeholders:** (personnel, customers, authorities, communities)

To monitor the evolution of our environmental performance, we have integrated key performance indicators (KPIs) on energy and water use, material yield, waste management and air emissions into our business and site procedures.

The continuous tracking and improvement of our data accuracy and our improvement projects reflects the expertise of our manufacturing processes, and our target of operational excellence.

Complying with required regulations, especially for waste and air emissions, is part of our SHE Excellence programme and managed

by our site, regional and global SHE representatives. This includes reporting of data, investigation of environmental incidents, risk assessments, defining and review of processes as well as internal and external ISO audits. As of 2019, we achieved 100% ISO 14001 certification of all our sites. Further implementation of an energy management system (EMS) is in line with other priorities of our recycling and low-carbon agenda.

Environmental topics are part of our Risk & Control audit programme and includes testing on compliance evaluations, soil investigations or remediation, and environmental control measures. In addition, all our sites have programmes to ensure open communication with the local communities.

Our global sustainability data are collected on an annual basis, in accordance with the GRI Standards disclosures and in compliance with local and national legislation. The sustainability data from our manufacturing sites are consolidated by SHE, energy, technology and sustainability managers and validated at site, regional and global levels. As a follow-up to the environmental data collection audit, we have integrated a new global software tool to support data collection and automation of processes.

This new application allows sites to independently input site environmental data that can be reviewed by a regional team. Additionally, changes in emission factors, local regulatory guidance can be programmed on a site basis to ensure the upmost accuracy in reporting.

As part of our goal to continually improve our operational and sustainability performance, we combine our site expertise with our global technology team, exchanging and developing the best available process and technology solutions

Our two new Chinese sites have been integrated into the company and construction has begun in both the ABS conversion project in Wingles, France and the ASA plant in Texas, USA. Expanding our operations gives us the opportunity to debottleneck our capacities and be more resource-efficient in our production, while implementing the best available technology to supply markets locally and reduce the environmental footprint of our products.

In our materiality assessment, greenhouse gas emissions, energy, resource efficiency, marine litter and pellet loss, water use, wastewater and waste generation, and air emissions were rated as being of high significance to our stakeholders and of key importance to our business.



OUR PERFORMANCE

Key highlights

- **3.1 %** reduction in **greenhouse gas emissions**
- Audits for **bio-attributed** offerings conducted in Antwerp

Sustainability targets

- **100%** of sites ISO 14001 certified by 2019
- **7%** reduction of VOC by 2019
- **Operation Clean Sweep®** audits for all sites by 2020



ENVIRONMENTAL DATA BOUNDARY

The following data represents the summary of the environmental impact, measured at all assets and legal entities of our 20 production sites worldwide. This covers the consumption and emissions from our activities and utilities that we source from third parties, but excluding emissions from our raw materials.

SCOPE

The performance data refers to the net impact of INEOS Styrolution's production activities, including emissions and consumption of resources. Treatment of wastewater or air emissions resulting from activities provided to non-INEOS Styrolution plants are excluded.

We have retained the same scope since the start of our environmental data collection in 2014. Any change has been described in detail in our previous sustainability reports.

METHOD AND ACCURACY

Water, wastewater, waste and energy usage is predominantly based on conducted measurements. In the cases where accurate measurements were not possible, estimates and assumptions have been made.

For air emissions from combustion gases (NOx) and solvent air emissions (VOC), our measurements and estimates comply with

local legal requirements for monitoring and reporting. As measuring equipment is not available at all sites, we used an accuracy limit of +/-3% for measuring, monitoring and collection of data for emissions and consumption. At our production site in Ulsan, South Korea, additional legal monitoring for VOC was required, which explains the change in scope and methodology from 2018 onwards.

and reviewed by our management team. We use material yield as an indicator for our resource efficiency performance. Raw material yield is defined as polymer or monomer produced per unit of raw material used. Our yield definition excludes low value by-products and waste streams, which however are also mostly further reused, recycled or recovered.

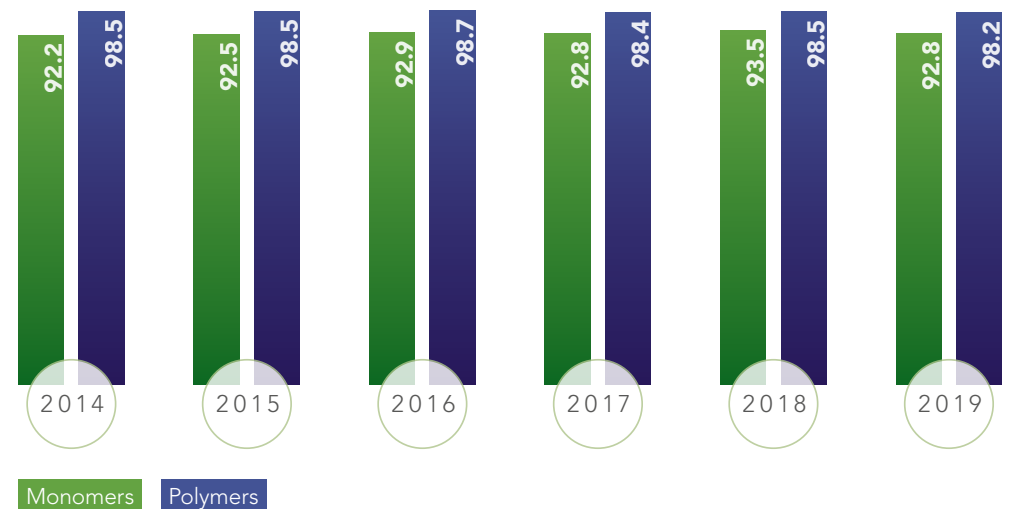
RESOURCE EFFICIENCY

Resource efficiency is central to our business and fundamental to our operational excellence as it relates to reliable operations. It is a driver for many of our improvement initiatives and capital expenditures as well as in our daily work at our production sites. It is internally reported

DISCUSSION OF DATA

The diagram illustrates the development of the material yield for our polymers and for our ethylbenzene styrene monomer (EBSM) plants. The yield for both polymers and monomers are at a stable high level. Monomer yield is lower than polymer yield, as more by-products are formed in the EBSM production process.

Resource efficiency: material yield [%]





WASTE REDUCTION

For INEOS Styrolution, waste management starts with efficient use of raw materials and the avoidance of waste generation where possible. When waste is produced, we first consider recycling, followed by energy recovery, and incineration or landfill as the last option.

Although a significant amount of waste is avoided by optimised operations and the reuse of side streams at neighbouring plants or sites, the amount of generated waste is still relevant. Our conscious waste management including appropriate storage, handling and

disposal are additional measures that we take to mitigate waste.

For our measurements, we define waste in accordance with international standards and as defined by national legislation and comply with all local waste management regulations. Waste accumulation at our sites can vary depending on the chemical processes and the presence of on-site utilities such as wastewater treatment plants. We aim to reduce landfill waste by exploring opportunities to recycle and reuse. In addition, we strive to reduce the overall amount of waste related to production.

We separate waste from demolition and asset care projects as these are project-related and not part of our daily operations. In order to reduce risk and increase to the safety within our sites, significant effort has been undertaken at numerous sites to remove redundant assets from our facilities. Sarnia, Cologne and Antwerp had significant removal work done in 2019.

DISCUSSION OF DATA

Our Asian sites are leading the way with significant reductions in the waste generated per kilogramme of production. Since 2014, our

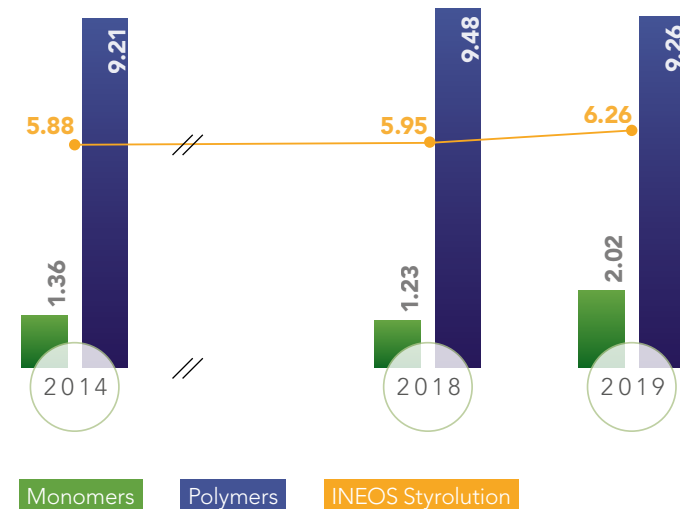
sites in South-east and North-east Asia have reduced their specific waste by 39%.

Investment in our new Chinese sites has shown great promise as the sites in Ningbo and Foshan are quite modern and generate very little waste. In Ulsan, South Korea, significant efforts have been taken to reduce the amount of sludge by enhanced dewatering.

The total specific waste linked to demolition and infrastructure projects decreased by 27% compared to 2018. The waste from projects is highly impacted by turnarounds at our

Specific waste (kg/tonne produced)	2014	2018	2019
By source			
Operations	2.72	2.88	2.69
Projects	0.80	0.94	0.69
Sludge	2.42	2.03	2.26
Municipal	0.67	0.65	0.48
Other	0.07	0.04	0.82
By destination including project waste			
Recycling & recovery	2.14	3.42	2.48
Incineration	1.97	2.33	2.18
Landfill	2.37	1.13	1.65
Other	0.05	0.03	0.63
By category including project waste			
Hazardous waste	2.04	2.05	2.23
Non-hazardous waste	4.50	4.86	4.71

Specific waste excluding project waste [kg/tonne produced]





production sites. During the shutdown, large projects are executed and equipment is exchanged. In 2019, a low number of sites had their turnaround.

As part of a redundant asset removal plan and upcoming investments, we expect figures for demolition waste to increase within the two next years while this plan is still in execution. For waste arising from necessary infrastructure or demolition works, we mainly focus on good handling practices and maximisation of recycling and reuse of the generated waste.

Over the last years, we have successfully shifted from landfill waste to recycling and recovery. Currently, 36% of our overall waste is sent to recycling and recovery and 24% to landfill. Over the period 2014 to 2019, landfill waste has been reduced by 30%, while waste that is recycled and recovered increased by 16%.

We continue to evaluate further measures to reduce landfill waste over the next years. One example of such a project is the evaluation of applications for an ABS rubber waste stream to

be reused or recycled.

Another key waste indicator is the distribution between hazardous and non-hazardous waste: 32% of our waste is hazardous waste and 68% is non-hazardous waste. Hazardous waste requires special handling, disposal and storage measures. We aim to minimise and recover our hazardous waste and recycle non-hazardous waste as much as possible.

Total specific waste linked to production from our polymer and monomer sites, excluding project waste increased by 6% compared to 2014. The main sources of production waste for polymers are process waste from ABS rubber production and sludge from wastewater treatment plants. The main sources of waste in EBSM production are project waste, spent catalyst and exported wastewater.

Over the period 2014 to 2019, waste generated by monomer production increased, resulting in an overall specific waste increase of 6%. Although we did not meet our overall waste reduction target, we were successful in significantly reducing the overall impact of our waste through specific waste reduction

projects and reducing the amount of waste sent to landfill. New acquisitions, project lines and construction works as well as a shift in our product portfolio towards specialties and high-quality polymer products (that generate a higher quantity of intermediate waste) has impacted our overall waste figures.



INEOS Styrolution production site in Map Ta Phut, Thailand



ENERGY EFFICIENCY

Conscious energy usage is integral to our resource efficiency efforts and is a key driver for all capital expenditure projects. Since the establishment of our company in 2011, we have completed a significant number of energy reduction projects, and every year, our Capex programme includes numerous initiatives to improve energy efficiency. We have implemented energy management systems to measure, monitor, internally report, and evaluate the use of energy.

An inventory of all ongoing energy improvement projects as well as other potential projects has been made, to ensure a clear understanding of the pipeline on energy

improvements. Best practices in terms of technology are shared during global technology exchange meetings. Benchmarks of sites with similar technology are shared and coordinated by our global technology group.

Energy management starts and ends with the efforts on each site. It is being integrated into daily operations and its implementation is continuously ensured. Therefore, the sites have energy managers or project managers in place, who coordinate actions within the departments. For Europe and the Americas, energy management is further coordinated at regional level, led by a dedicated regional energy manager.

Energy reporting at our 20 sites involves fossil fuels, electricity, steam and oil residues. The energy usage can vary annually depending on site-specific conditions such as turnarounds and the type of chemical process.

DISCUSSION OF DATA

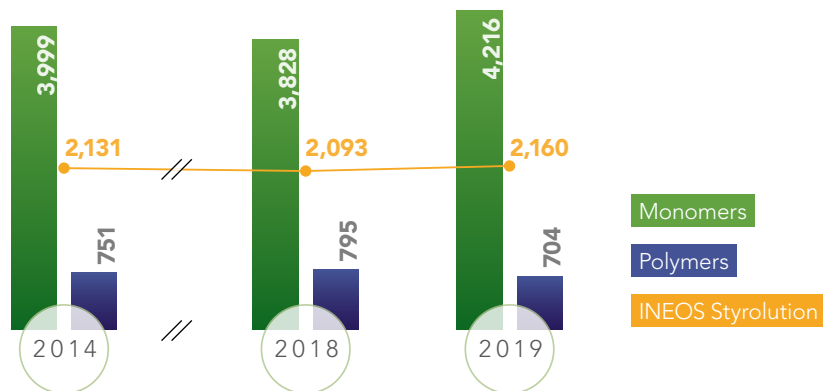
In 2019, 54.8% of our energy use was from fossil fuels, 35.0% from steam and 8.6% from electricity. In general, steam and fossil fuels are mainly used by EBSM plants, whereas extruders at polymer production sites use a higher quantity of electricity.

Compared to 2018, our polymers production sites show a decrease of 11.5% in specific

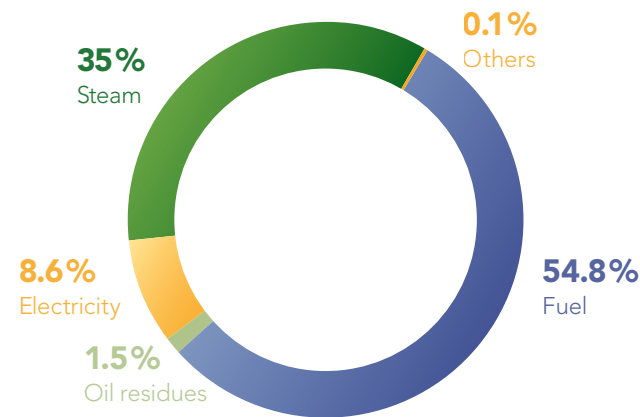
energy use in 2019. Leading the way are our European polymers sites that have shown continual improvement year over year since 2014. Additionally, the two new Chinese polystyrene plants have shown to be highly energy-efficient.

Our four EBSM plants represent approximately 80% of our global energy usage. This is a direct result of the different thermodynamics of EBSM processes versus polymer processes.

Specific energy consumption [kWh/tonne produced]



2019 Share by energy source





GREENHOUSE GAS EMISSIONS

We have committed to reduce our greenhouse gas (GHG) emissions and take actions to mitigate the negative effects of climate change to keep temperature increase well below 2°C (above pre-industrial levels). Our efforts and interests to comply with the globally established carbon emission targets, is of high interest to our customers, stakeholders and investors.

We report and review our carbon dioxide scope 1 and 2 emissions on an annual basis. This includes review and validation of each site, methodology, conversion factors and ETS (emissions trading system) reporting. Energy and GHG reduction projects are identified and tracked in our Capex system and exchanged within the INEOS Carbon & Energy network. Within this network, joint cooperation within INEOS businesses for energy efficiency projects as well as innovations are shared and discussed on a regular basis.

The reported emissions cover the scope 1 and 2 CO₂ emissions as defined in the Greenhouse Gas Protocol. Scope 1 emissions include direct emissions from fossil fuel consumption at our sites as well as process-related emissions from NO_x (nitrous oxides), CH₄ (methane) and CFC/HCFCs (chlorofluorocarbons/hydrochlorofluorocarbons). Scope 2 includes indirect CO₂ emissions related to sourced electricity and utilities such as steam. CO₂ emissions are evaluated either based on CO₂

conversion factors or calculated based on the carbon content in fuels. The used conversion factors are either given by energy suppliers, national/ regional authorities or taken from global warming potentials as stated in international standards such as the Intergovernmental Panel on Climate Change (IPCC) or the GHG protocol.

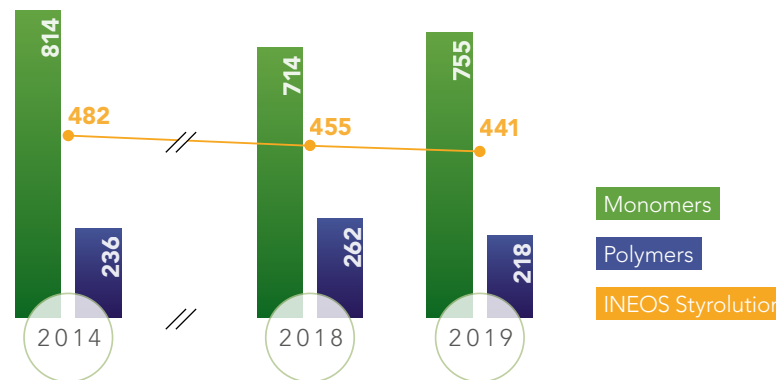
DISCUSSION OF DATA

In 2019, 48% of our total greenhouse gas emissions were emitted by scope 1 emissions and 52% by scope 2 emissions. It can be seen that 20% of our GHG emissions was related to electricity production, although only 9% of our energy consumption was electricity-based. The key factors here are CO₂ conversion factors for electricity that can strongly vary

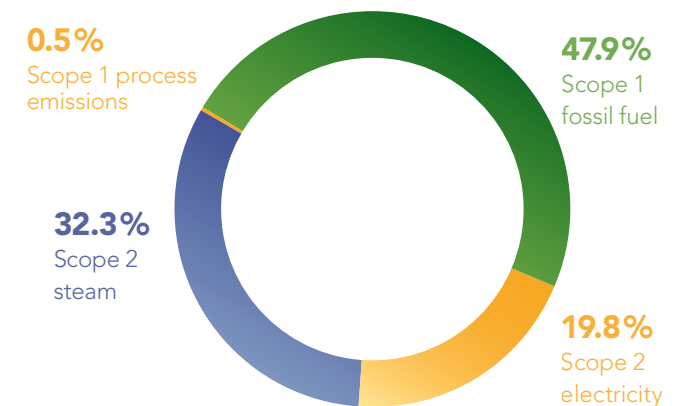
depending on the local supplier. The accessibility and availability of energy sources, especially renewable energies, can be nationally and regionally limited. Increasing the share of renewables in our electricity mix to reduce the carbon impact of this energy source will be subject to further follow-up in 2020 and beyond.

In 2019, our EBSM production sites reported an increase in specific greenhouse gas while the polymer production sites saw a decrease of 16.6% when compared to 2018. The combination of polymers and monomer production sites led to an overall specific decrease of 3.1% compared to 2018. Overall, we have reduced our GHG emissions by 8.4% over the period 2014 to 2019.

Specific greenhouse gas emissions [kg/tonne produced]



2019 Greenhouse gas emissions by source





WATER USE

We report on process and cooling water, relating to the efficiency of our processes. By definition, process water comes in contact with our product and can be either reused or sent to an on-site or off-site wastewater treatment facility. Cooling water does not come into direct contact with the product, therefore no organic contamination occurs. In case of a separate discharge point, it can be routed back directly to a river or sea, without further treatment by a wastewater facility. Regardless of regional differences, the use and discharge of process and cooling water are monitored by quantity and quality.

the river via dedicated discharge points, separated from wastewater. The cooling water demand of the semi-open systems is more dependent on the temperature of the water source and is impacted by the warm summer period in the EMEA region.

In Asia-Pacific and in Americas, the cooling water is discharged together with process wastewater, leading to relative higher volumes of discharged wastewater. Closed cooling water loops are being installed wherever

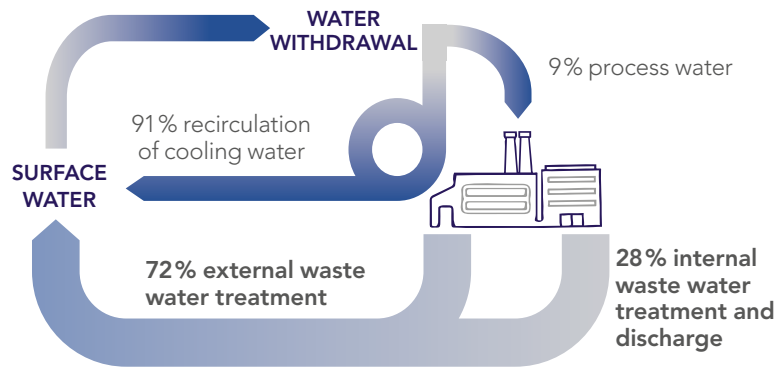
possible during turnarounds or other installation replacements.

At our styrene monomer sites in the Americas, evaporative cooling systems are used, in which cooling water ends up as water vapour. In addition to technical differences, these systems require significantly higher cooling water amounts during the warmer summer months. Process water use fluctuates much less due to meteorological circumstances and is rather linked to stable and reliable

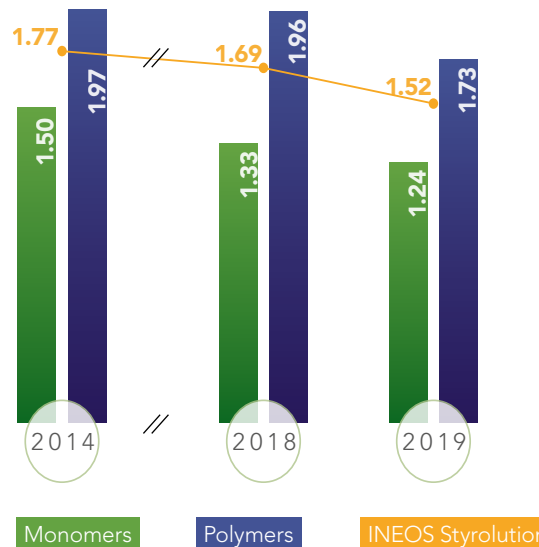
operations. Our initiatives to reduce water use are also in line with our set target focus on process water.

The table and graph indicate the breakdown of data on our total water use in cooling water and process water as well as our wastewater discharge. Compared to 2018, specific water use including cooling water decreased by 16%. Excluding cooling water, the process water demand also reduced by 10%.

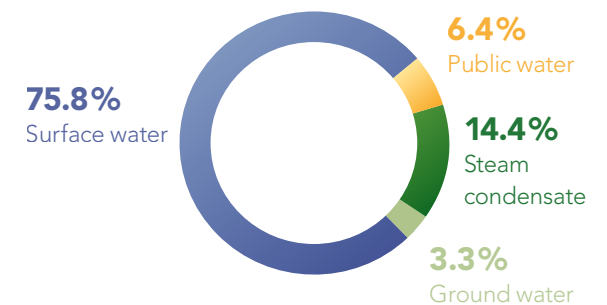
At our EMEA sites, we use semi-open primary cooling water systems that often extract water from nearby surface water bodies, such as the Rhine and Scheldt rivers. After use in cooling processes, this water is partially routed back to



Water withdrawal excluding cooling water [m³/tonne produced]



2019 Water usage by source





DISCUSSION OF DATA

Water used for production purposes is drawn from different sources, such as surface water and wells. It can also be imported from neighbouring sites, which has a different environmental impact. Groundwater is the less favoured source. Only 4.1% of our total process water consumption comes from ground water.

Reporting the total volume of our water use subdivided by source contributes to our understanding of its overall impact and evolution. Compared to 2017, surface water (our primary source of water use) increased by

0.8% and public water increased by 5%. Groundwater use increased by 15% due to an underground leak and limited measurement for detection. This will be subject to further follow-up and improvement in 2019 and beyond. The water imported by steam condensate decreased by 9%. The usage of steam condensate can vary at sites, depending on the required import and export to other facilities.

In general, polymer production sites use more process water than monomer production sites. Compared to 2017, water use by monomer

production reduced by 6.2%, whereas our polymer production plants increased their water use by 3.5%. The reasons for this fluctuation are limited measurements, housekeeping, increased cleaning and a new demineralised water plant in Altamira, Mexico. In addition, our polymer portfolio shift towards high quality specialties products, for example for medical applications, caused higher water consumption. Overall, withdrawal of process water reduced by 0.2% in 2018, resulting in a reduction 4.3% between 2014 and 2018. This is in line with our target of 3% reduction over the

period 2014 to 2018. Over the past years, we have executed multiple water reduction projects, such as the reuse of process water at our EBSM plant in Antwerp, Belgium, and the efficient new underwater pelletising unit at our polystyrene plant in Wingles, France.



INEOS Styrolution production site in Altamira, Mexico



WASTEWATER

The amount and quality of water discharged by our sites is directly linked to both ecological impact and operational costs. Good treatment of emissions and reduction of wastewater discharge mitigates our impact on rivers and local habitats. We are committed to further reducing our environmental impact by progressively improving the quality of discharged water and by reducing volumes.

All of our production sites have wastewater treatment plants at site or send their wastewater to an external wastewater treatment facility. Several measures, such as closed-loop water systems to reuse the water for cleaning purposes or as cooling water, as

well as procedures to reuse their process water or condensate at neighbouring production plants, are in place or in progress. Our process sedimentation basins, filters, as well as flotation units contribute significantly to preventing solids from entering wastewater treatment facilities. Due to water scarcity in India, effluents from the wastewater treatment is used for irrigation on site.

Wastewater is a key indicator and part of local and national reporting at each of our production facilities. Compliance with all local requirements is actively monitored and anticipated, led by our SHE managers onsite as well as our regional SHE managers.

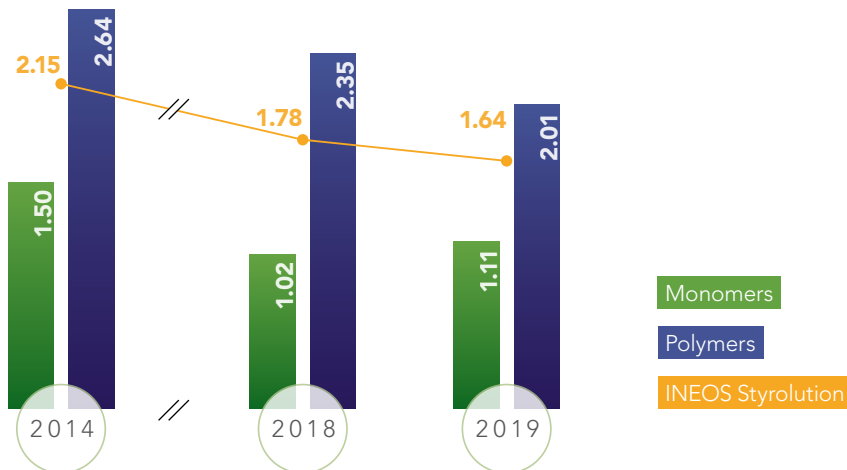
All process wastewater as well as contaminated cooling water are included in the reported scheme. After internal or external treatment in wastewater treatment facilities, the water is directly discharged to surface water.

DISCUSSION OF DATA

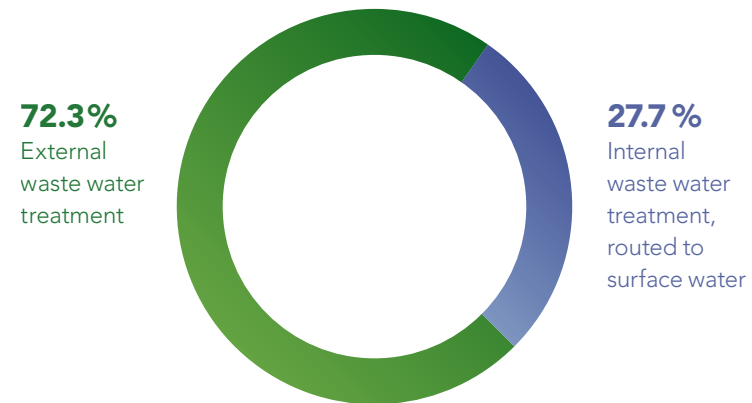
Globally, 28% of our total wastewater is treated on site and 72% of our total wastewater is sent to a third party wastewater treatment facility. Compared to 2018, we reduced overall specific wastewater by 8%. In general, polymer production sites discharge more wastewater than monomer production sites. Wastewater discharge by monomer production sites increased by 9.5% since the previous year. The

14.6% decrease in wastewater discharge for polymer production sites in 2019 is connected with the decrease in water use at these sites. During 2014 to 2019, we achieved a 24% reduction in wastewater discharge. This means we have continued to improve beyond our reduction target of 7%.

Specific waste water discharge [m³/tonne produced]



2019 Destination of discharge





AIR EMISSIONS

Air emission management is of high significance to our industry's environmental management. It ensures that the air quality in the neighbourhood remains suitable and that the impact on nearby habitats and our atmosphere is limited. Air emissions are therefore highly regulated and part of the technical handling, advanced monitoring and reporting, and are subject to continuous improvement.

Air management is an integral part of the

environmental management of our sites. Air emissions from manufacturing (VOC) and combustion gases (NOx, SOx, CO and dust) are monitored at each site according to local legislation. We treat our air emissions from our production sites with methods such as condensation, filtration, absorption or incineration, in line with national and local legislation requirements. The results are reviewed and evaluated for further optimisation. Diffuse air emissions in operations are monitored via leak detection and repair procedures.

DISCUSSION OF DATA

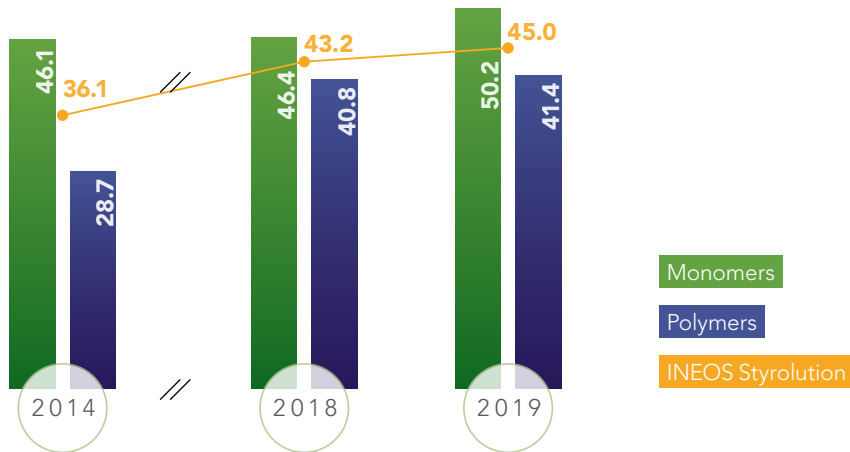
Compared to 2018, we reported a 1.5% increase in global specific air emissions, NOx increased by 6.8% and VOC by 4.3%, while CO decreased by 20.5% and dust increased by 2.2%.

The air emissions of NOx, CO, SO₂ and dust are related to the combustion of fossil fuel and waste. The large increase in SOx is due to specific monitoring activity at our polymer site in Thailand, which we have adjusted.

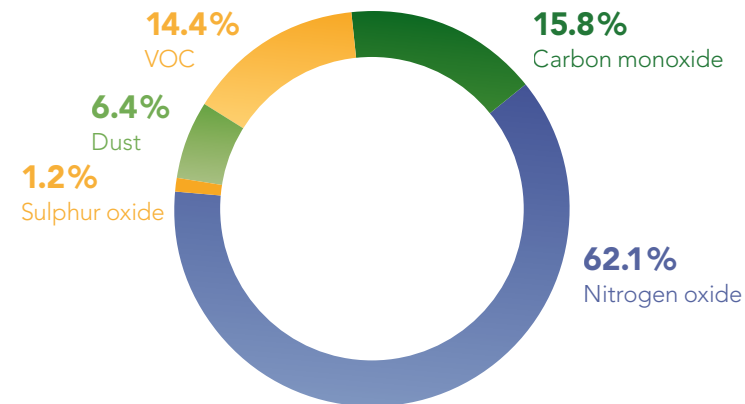
In Ulsan, South Korea, new measuring points were installed due to additional legal monitoring of VOCs, improving our baseline and giving us a broader scope for future improvements.

In Antwerp, Belgium, measures to reduce VOC emissions back to 2015 levels have been implemented. Our overall specific VOC emissions decreased by 15.4% from 2014 to 2019.

Specific VOC emissions [g/tonne produced]



2019 Air emissions by share





PREVENTING PLASTIC PELLET LOSS WITH OPERATION CLEAN SWEEP®

Marine litter and pellet loss is a global issue and a key concern for us. The general sources for pellet loss in the environment are pellet-handling facilities such as pellet manufacturers, logistics and transportation companies, processors, compounders, suppliers or customers.

Operation Clean Sweep® (OCS), the industry programme to prevent pellet loss, which we joined in 2015, is an important priority for us. OCS builds up on five action pillars: commitment, assessment, facility upgrade, awareness and improvement.

During our implementation period, we performed a root cause analysis and defined preventive and mitigation measurements to avoid the escape of pellets from their primary containment. Potential locations for spillage can be within operations (such as packaging areas), logistics (loading and unloading areas) or warehouses.

Examples of our preventive measurements are additional covers for pelletisers, spilling protections, funnels, sizing of collection tools or pipes. In case of an occasional spill, mitigation steps such as systematic clean-up by our employees, pit collections, filters in rainwater drainages and wastewater treatment facilities have been installed to prevent stray pellets leaving our sites. In case of such an

incident, preventive and mitigations measurements are re-evaluated and enhanced.

To continually improve our OCS approach, we enhanced our cleaning equipment protocols, reviewed our housekeeping programme, extended AsCare initiatives, and trained employees and contractors. In addition, supervisors performed frequent checks in higher risk areas. The importance of OCS has been communicated to our contractors and integrated where possible in their bonus malus performance measurement.

OCS is integrated in internal awareness campaigns, in internally and externally performed audits, and communicated to the supply chain to encourage and raise awareness to the OCS programme.

HIGHLIGHTS OF OUR 2019 PERFORMANCE

The following examples highlight initiatives undertaken at a regional level:

- **All our Asian sites completed their on-boarding to the OCS programme.** Hereby, all the pillars of OCS have been integrated and adapted into daily operations. We will continue to improve our preventive and mitigation measures in operations.
- **At our sites in the EMEA, we continued**

our engineering study on truck blowing

We reviewed best-practice solutions regionally as well at the INEOS group level.

At each site, we reviewed potential locations, engineering possibilities and required regulations. Once finalised, the project will move to the next implementation stage.

- **In the Americas, we continue to enhance preventive and mitigation measures.** In Channahon, we cleaned up rail car gravel, silo trenches and upgraded our piping junctions. At our Mexican site in Altamira, root causes for silo overfilling have been mediated, and pelletiser gaskets and clamps have been replaced.
- **In our supply chain:** Systematic audits of our supply chain have been implemented in all regions. Hereby internal and external warehouses, tollers and transloading areas have been reviewed. Based on the results, audits will be repeated on a longer or shorter timeframe.
- **We continued our engagement within the PlasticsEurope OCS task force** to increase communication with governmental and non-governmental organisations on pellet loss and exchange best practice examples. Locally in Antwerp, we participate in the Port of Antwerp OCS initiative to address and prevent pellet loss at the regional chemical hub, collaborating with all stakeholders such as manufacturers and logistics providers. Frequent exchange meetings, investments

and annual waste collection events are part of our engagement.

Due to the success of our supply chain audit and the on-boarding of all regions to OCS, we are extending the level of transparency to ensure that all sites fulfil the same standard requirements. Operational audits started in 2019, but have been postponed due to COVID-19 restrictions.



TRANSPORT & DISTRIBUTION

ENVIRONMENTAL FOOTPRINT

Transport and distribution is integrated into our supply chain management. We rely on an intermodal distribution model of trains, ships and trucks to find the most efficient route for the worldwide distribution of our products.

As we have production sites worldwide, we are able to serve our customers from closer locations, which helps minimise intercontinental transport. We do not apply airfreight as a regular mode for intercontinental transports.

In order to lower our environmental impact, we favour the use of rail and sea transport, rather than road-based transport. We aim to ship our products directly to our customers without the use of intermediaries and use off-site warehouses for temporary or overflow storage only.

Since bulk shipments have a lower environmental impact, we encourage our customers to order in bulk when possible. We select our service providers according to a set of quality standards, such as safety, environmental friendliness, as well as adherence to social, ethical standards and technical standards of the chemical industry and the INEOS Styrolution Supplier Code of Conduct.

Euro 6/ VI is the latest and most comprehensive EU standard on the reduction of exhaust emissions from passenger and commercial vehicles. We encourage our logistics providers to always be at the highest norm (Euro 6/ VI), with tendering being undertaken regularly. Measuring our safety and environmental impact helps us optimise our performance and monitor improvements. Therefore, we collaborate with environmentally friendly logistics partners to set and measure our environmental and safety performance, such as miles travelled, fuel consumed, greenhouse gas emissions, loss of containment as well as transport accidents and collaborate with them on reducing their carbon footprint.

In support of the Operation Clean Sweep® (OCS) initiative, we regularly audit our logistics service providers and ensure sharing of best practices to avoid any pellet loss in the environment.

TRANSPORT SAFETY

We have internal reporting criteria for distribution incidents that require detailed follow-up and reporting to our management board. This means that all transport incidents have a very high visibility and priority in the company and learnings from all transport incidents are shared within the organisation.

We also use the European Chemical Industry Council (Cefic)'s Safety & Quality Assessment System (SQAS) to evaluate the performance of our logistics service providers and chemical distributors, and thereby assure carrier competence and reduce the likelihood of incidents. SQAS assessments cover quality, safety, security, environment and CSR.

In EMEA, we are increasing the rigour of the application of the SQAS, and in Asia-Pacific, we are in the process of implementing SQAS and performing our own assessments of our logistics service providers. In the Americas, we rolled out a logistics service provider assessment where we monitor U.S. motor carrier safety and performance data published by the Federal Motor Carrier Safety Administration via their Safety Management System (SMS) tool. The SMS is a huge database, which contains all incidents, audits and assessment data relative to our contracted carrier fleet.

It helps us spot trends and develop interventions in areas, such as driver fitness, vehicle maintenance, and unsafe driving. For sea terminals, we are rolling out a programme to assess management systems against Oil Companies International Marine Forum (OCIMF)'s International Safety Guide for Oil Tankers and Terminals (ISGOTT) management standards. OCIMF is a voluntary association of oil companies with an interest in the shipment and terminalling of crude oil, oil products, petrochemicals and gas. ISGOTT contains management standards for equipment, security, emergency response, risk assessment, tanker/ terminal interface and personal safety. It is intended to reduce the likelihood of injury to people as well as to reduce both the likelihood and severity of environmental incidents. All our sea terminals will conduct a self-assessment against these standards, which we will follow up with a validation inspection with the INEOS Marine Assurance Group.

VALUING OUR PEOPLE



ENGAGING AND DEVELOPING OUR EMPLOYEES [↪](#)

DRIVING SUSTAINABILITY ALONG THE VALUE CHAIN [↪](#)

SUPPORTING THE COMMUNITIES IN WHICH WE LIVE AND WORK [↪](#)



ENGAGING AND DEVELOPING OUR EMPLOYEES

Our people are INEOS Styrolution's most important asset. Their creativity, diversity, knowledge, passion and expertise help us achieve a competitive advantage and drive business success.

OUR APPROACH

One of our core guiding principles is "valuing and respecting people" and we aim to maintain positive relations with our employees and develop a healthy working environment where our workforce can develop and maximise their potential.

With 20 manufacturing sites in ten countries and 24 sales offices around the world, our employees are accustomed to working with people of diverse cultural backgrounds. We truly believe in diversity and equal employment opportunities regardless of gender, age, nationality, religion, race, or cultural background.

Market conditions and local legislation vary per country, and because of this, our employment strategy is mainly locally driven.

Nevertheless, regardless of location, we are committed to offering employees an appealing work environment with competitive remuneration and benefits, as well as attractive opportunities to grow and develop professionally. Our remuneration policy is geared – through higher variable terms – toward an above-average remuneration of employees, and is oriented toward country-specific conditions within the chemical industry, in all countries in which the company is active. We do not deviate between part-time and full-time employees in terms of remuneration and apply equal salary and remuneration development for new hires as well as employees.

In a competitive, global industry such as ours, success hinges on our ability to attract and retain the most qualified and committed employees in each of the markets we operate. We are always looking for people whose skills and aspirations are an optimal fit for the responsibilities they will undertake. We welcome the best candidates based on merit, and practice principles of equal opportunity for recruiting and advancement in order to access a broader talent pool and foster innovation.

In our materiality assessment, being a reliable employer as well as education and training were rated as being of high significance to our stakeholders and of strategic importance to our business.

OUR PERFORMANCE

Key highlights

- Implementation/ first merit round in **Compensation module of HR Information system**
- Development and launch of our regional **requirement website** in EMEA

Sustainability targets

- **80%** of exempt employees to have an **Employee Development Interview** **Achieved (91%)**
- Implementation of **Management Development Programmes** in all regions in 2019 **Achieved**
- **Employee survey** for the entire workforce conducted in 2021



EMPLOYEE DEMOGRAPHICS

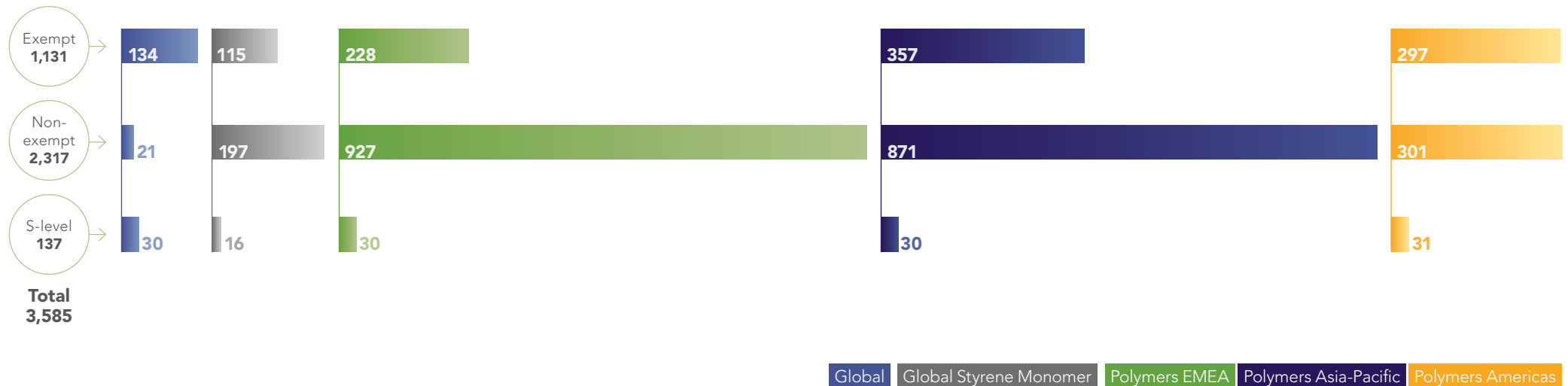
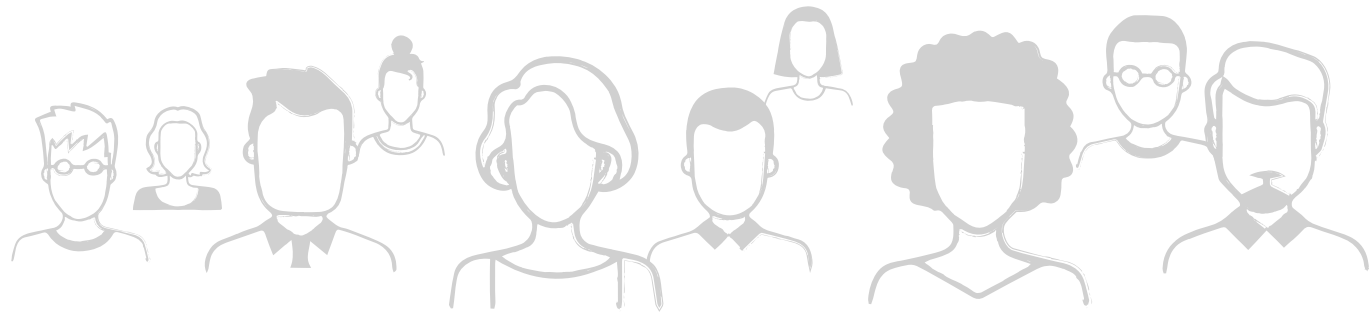
Since 2014, we have been tracking changes in our employee demographics by region and business unit based on gender and age. We do not track demographic data based on

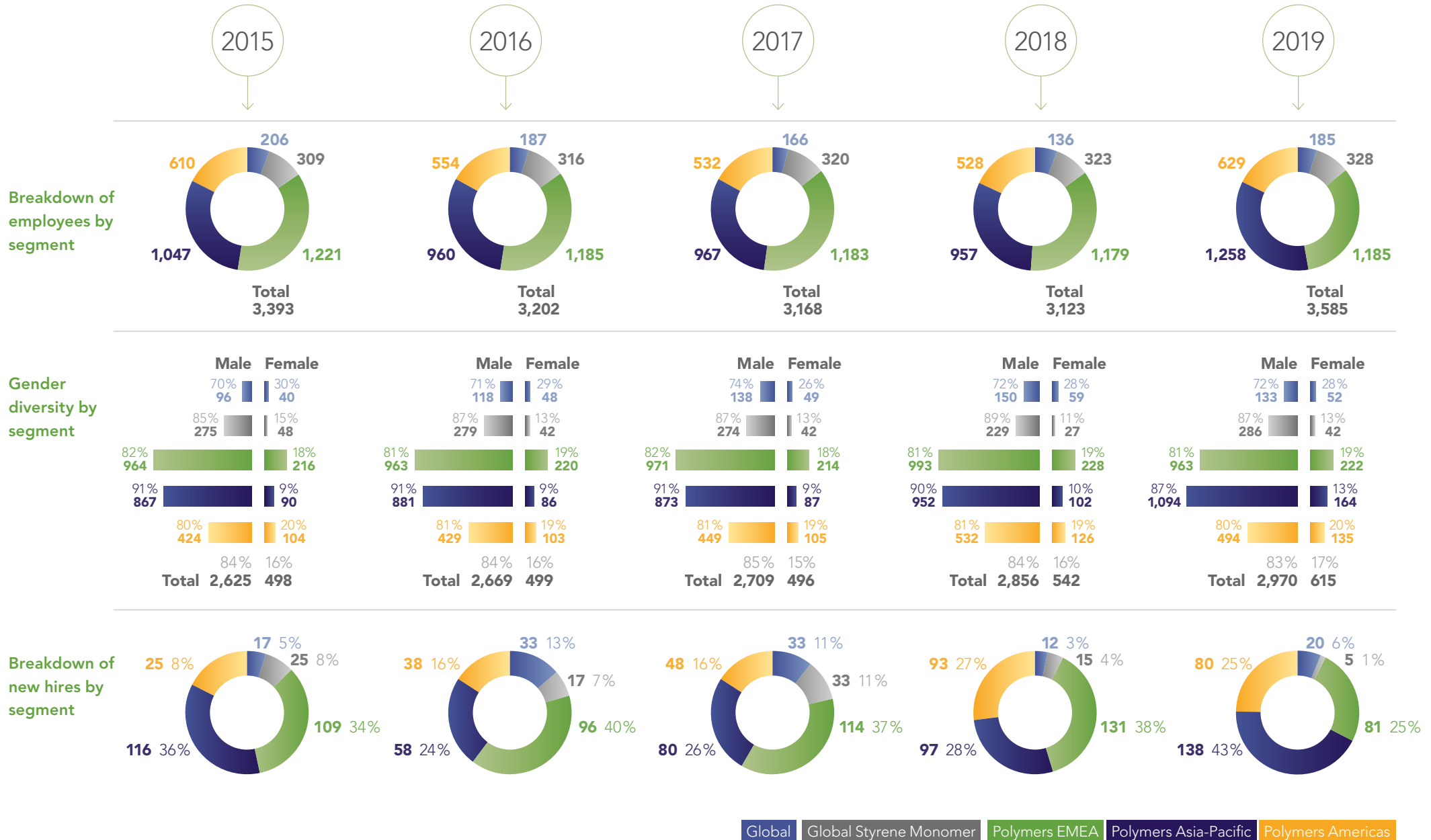
ethnicity because definitions of racial minorities differ from country to country, and collecting such data in some regions is a violation of privacy laws. We currently do not

disclose employment data based on part-time and fulltime contracts, as it is not material in our business. In 2019, INEOS Styrolution's workforce totalled 3,585 employees with 83%

male and 17% female employees. Higher gender diversity is evident in our three regional headquarters, where categories of professional function are broader.

Breakdown of employees by contract type







GLOBAL EMPLOYEE TURNOVER

INEOS Styrolution strives to provide a setting for rewarding, life-long careers. We track both voluntary exits and involuntary exits. In 2019, 234 employees left INEOS Styrolution, which translates to a global employee turnover of 6.8%. The increase is mainly driven by the increasing number of retirements. We will continue our efforts to retain talent as well as introduce young talent to the company.

We also recruit young graduates as part of a programme offered by our parent company INEOS that aims at recruiting and developing the best commercial and engineering graduates internationally.

In 2019, we developed recruitment websites for the EMEA region. Through these dedicated websites, job applicants from Germany, Belgium and France immediately get some basic information about the company and their potential job environment. Following the successful launch of the websites in EMEA, we are now developing recruitment websites in the Americas and Asia-Pacific as well. We plan to launch the two regional websites in 2020.

In order to reduce our voluntary departures, we are working to get a better understanding of the motivations of those who resign. We

have implemented processes to make exit interviews consistent across all regions and include more job levels. In addition to this new globally structured process, we expanded our management development programme to include the Americas and Asia-Pacific.

GLOBAL HR INFORMATION SYSTEM

Our global Human Resources Information System, which was launched in 2018, resulted in a big improvement in terms of the accuracy and quality of our global employee master data. This system has also enabled globally aligned, transparent and professional processes around recruitment, on-boarding, learning and performance reviews.

Professional development was extended with our Senior Management Development Programme, our regional Management Development Programmes, and an increased focus on employee development interviews (EDI). Moreover, our performance review system has been optimised. Two new modules, Performance & Goals and Compensation, were added in 2018 and 2019, respectively. The module on Succession Planning and Development will be included in the system in 2020.

IMPROVING EMPLOYEE ENGAGEMENT

In 2019, we further implemented measures following on the outcome of our global survey conducted in 2017. To measure the impact of

the changes made, we will be conducting a follow-up survey in 2021.

Health and fitness of our employees is important to their physical and mental well-being. Therefore, we support and encourage a healthier lifestyle for our employees. Many of our production sites and offices have fitness centres within the company premises, where employees can make use of the facilities thanks to subsidised fees by the company.

DEVELOPING OUR PEOPLE

We follow local legislation with regard to renewing technical certificates for employees both at our offices as well as at our manufacturing sites. To further drive generational balance, we focus on tailor-made training and succession planning for all employees globally.

In 2019, we introduced DISC, a behaviour assessment tool, to enhance collaboration within teams. A series of elearning courses as well as workshops about DISC were provided with individual feedback sessions also offered on demand.

For exempt employees, a management development programme has been implemented in each region. By the end of 2019, around 116 employees attended either the global senior or the regional management development programme. These programmes

Employee turnover

	GLOBAL	STYRENE MONOMER	EMEA	ASIA-PACIFIC	AMERICAS	TOTAL
Resignations	9	2	62	59	28	160
Terminations	3	0	4	8	8	23
Redundancies	1	0	0	1	0	2
Retirements	3	1	3	19	20	46
Others (incl. deceased, disabled, probation period failure)	0	0	2	1	0	3
Total	16	3	71	88	56	234
Compared to total leavers	8.1 %	0.9 %	6.8 %	7.0 %	8.9 %	
Compared to average headcount	0.4 %	0.1 %	2.2 %	2.5 %	1.6 %	6.8 %



will continue to run with new candidates every year.

In 2019, all 1,268 exempt employees reported an annual performance review with their manager. In the case annual performance reviews were not done, it was due to factors such as maternity leave, parental leave or long-term illness. Due to the new Performance

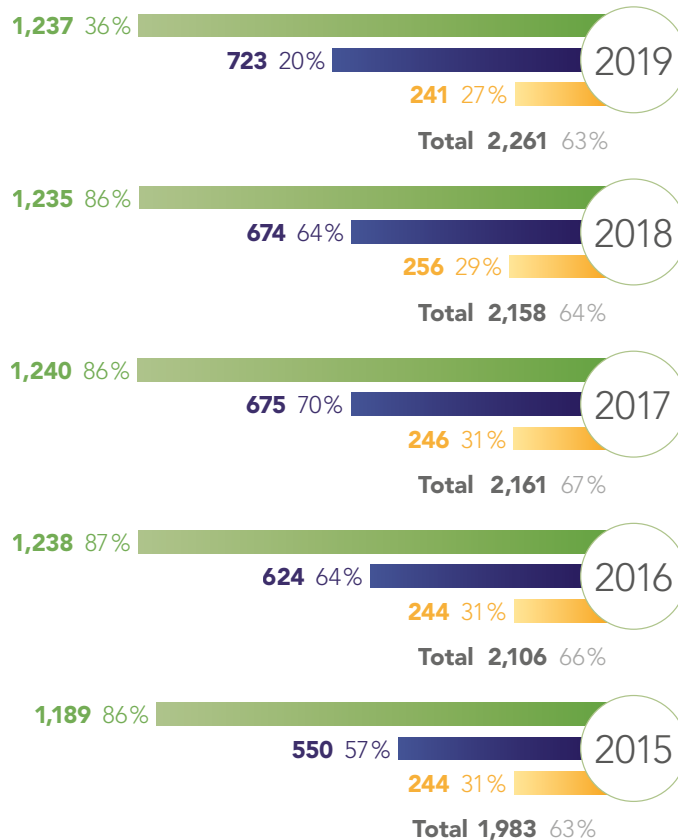
& Goals module in our global information system, Human Resources, direct managers and upper management are capable of tracking objectives, calibration and the progress of employees.

In addition, an employee development interview (EDI) process is available for exempt employees worldwide. The employee and their

manager jointly discuss skills needed to perform their work, skills that might be needed to fulfil future requirements and aspirations, and professional development steps that can be taken to enable the acquisition of those skills.

In 2019, 91% of our exempt employees had employee development interviews jointly with their manager.

Collective bargaining by region*



Polymers EMEA

Polymers Asia-Pacific

Polymers Americas

*this includes non-exempt employees globally, except South Korea where employees up to grade 37 are included

OPERATIONAL CHANGE AND COLLECTIVE BARGAINING

INEOS Styrolution makes every effort to give a reasonable notice period to employees impacted by significant change. We respect and apply legal notice periods in compliance with local legislation regarding advanced notification of operational change. Our employees have the freedom to organise and collectively bargain. We do not intend to impair the rights of any employees included in any collective bargaining agreement, or prohibit the lawful exercise of any rights guaranteed by any applicable legislation. In 2019, 63% of INEOS Styrolution's workforce was covered by collective bargaining agreements.

COMBATING COVID-19: SUPPORTING OUR EMPLOYEES

To curtail the spread of COVID-19, we acted swiftly to safeguard employees and migrate to a new way of working. We implemented "working from home" for all office staff, even before the official mandate by governmental authorities. Our teams globally have been as productive from home as in the offices with virtual meetings and digital communication seamlessly replacing face-to-face discussions. We ensured that only required staff were present at a time in our production facilities with the necessary distancing and hygiene measures in place. Sufficient masks, disinfectant and hand sanitisers have been provided to all employees when entering the company premises.

Since the beginning and throughout the lockdown phase, we ensured periodic and consistent messaging to employees.

The return to offices is being done gradually in specific locations, with strict hygiene measures as well as social distancing procedures. This is being monitored on a daily basis in case additional measures need to be implemented.



DRIVING SUSTAINABILITY ALONG THE VALUE CHAIN

Our efforts to monitor and enhance our sustainability performance are grounded in the activities of our own business. We believe, however, that our overall responsibility is not limited to our own manufacturing sites. We, therefore, assess sustainability performance along the entire styrenics supply chain to ensure that our suppliers meet high sustainability standards.

In our materiality assessment undertaken in 2017, sustainable procurement was assessed as being of significance to our stakeholders and of strategic importance to our business.

Together with our various supply chain partners, we continue to ensure efficient and effective production planning and execution as well as filling and storing of finished and intermediate material, based on customer demand and requirements. By engaging our stakeholders on sustainability performance, we limit the risk of delivering products to the marketplace that are not in line with our values or the stated intent of our sustainability programme.

The cornerstone of our supply chain management is our Supplier Code of Conduct, and defines our minimum expectations and requirements in supplier standards, including labour practices and human rights, health and safety, environmental protection, ethics and fair business practices.

We expect all our suppliers – at a minimum – to comply with INEOS Styrolution’s Supplier Code of Conduct, which provides additional details of our expectations from suppliers. We also monitor and review their performance through our own internal assessments as well as through third-party assessors.

OUR APPROACH

Sustainable procurement practices are increasingly driving companies’ purchasing decisions, policies and reputation. We work with over 10,000 suppliers worldwide that provide us with raw materials, equipment as well as services, such as logistics, utilities and IT. As a company with a global reach, we have the ability to influence the sustainability practices in our supply base and are committed to forming strategic partnerships with our top suppliers that have the most impact on our business from a risk and spend perspective.

Responsible business practices across our supply chain



Responsible procurement of our raw materials & supply chain



Energy- & resource-efficient production of granules in our plants



Safe & reliable transportation of our granules to our customer’s site



OUR PERFORMANCE

Key highlights

- Development of an **ECO sourcing strategy** with procurement of renewable and post-consumer waste as future feedstock | **In progress**

Sustainability targets

- **80%** of total supplier spend to be third-party assessed by end of 2020 | **On track (78%)**
- **100%** of buyers trained on sustainability in 2019 **Achieved**
- Sustainability to be included as a **key component** in supplier excellence programme by 2020 | **In progress**

ENSURING RESPONSIBLE BUSINESS PRACTICES ACROSS OUR SUPPLY CHAIN

Underpinning a circular economy is a circular supply chain. Therefore, in addition to working with suppliers, collectors, sorters and recyclers upstream, we also focus on our downstream value chain. We want to be a responsible and reliable supplier to our customers and we support them in becoming more sustainable.

Our newly launched ECO family of sustainable products includes materials comprising recycled post-consumer plastic waste as well as materials based on renewable feedstock. Therefore, we are engaging with waste collectors, sorters, and recyclers in our supply chain to secure high-quality post-consumer waste for our recycled polystyrene and ABS products.

We are also offering the integration of renewable feedstock as a replacement for fossil fuel. Our renewable feedstock is sourced from several types of bio-feedstock, and is certified by the Roundtable for Sustainable Biomaterials (RSB), thus complying with the highest sustainability criteria.

Our entire ECO family supply chain from bio-feedstock producers to our own manufacturing has been assessed according to international recognised RSB criteria. These criteria cover legal, environmental, social and management aspects. Our supply chain will get certified on an annual basis.

With our ECO range of products, we will significantly reduce the greenhouse gas footprint -- for ourselves as well as for our customers down the value chain. For more information on how we support our customers, see chapter ["Shaping the future with sustainable styrenics"](#)

To quantify the sustainability of our supply chain, we conducted detailed greenhouse gas (GHG) calculations of key materials (scope 3 emissions) such as our recycled material as well as bio-feedstock. The use of recycled and bio-feedstock as raw materials will be measured as a key indicator towards our 2025 roadmap. Our baseline will be the year 2020, as upscaling has planned from then on.

In addition, we limit the negative impact of plastics in the environment due to pellet loss by engaging with our downstream value chain to have them comply with our efforts to avoid. For more information, see chapter ["Reducing our environmental footprint"](#)

ENVIRONMENTAL AND SOCIAL RESPONSIBILITY IN OUR SUPPLY CHAIN

In 2019, we provided a refresher training for all our existing buyers as well as a training for new buyers as part of their onboarding. Our top suppliers, comprising companies with long-standing sustainability programmes, account for about 80% of spend volume. Since 2016, INEOS Styrolution has been assessing the sustainability performance of our suppliers through annual internal assessments as well as through independent third-party assessors such as EcoVadis.

Over the past three years, the percentage of global supplier spend assessed on

environmental and social criteria increased from 67% to 78% and we are on track to reach the target of 80% by 2020. As a next step, we aim to identify our critical suppliers based on risk assessment to prioritise ones that have a relevant sustainable impact to our business and include them in our monitoring and assessment.

As part of our Supplier Excellence initiative, in 2019, we developed a sustainability dashboard, which gives us an overview of our suppliers based on sustainability criteria such as environmental protection, labour practices, ethics and fair business practices, as well as health and safety. The data is updated in real time by our robotic automation process. Through this process, we ensure a systematic sustainability screening of our suppliers, evaluate the sustainability performance of our suppliers and monitor our own sustainability performance.

We are systematically integrating sustainability as a key component in our Supplier Excellence programme, such as including additional sustainability criteria to evaluate supplier performance. This programme encourages buyers to work together with large and small suppliers to innovate around sustainability and move towards a fully circular business model.



SUPPORTING THE COMMUNITIES IN WHICH WE LIVE AND WORK

Our responsibility does not end at our company gates. We want to be an active and supportive member of the communities in which we operate.

OUR APPROACH

A key cornerstone of our community involvement activities is our responsibility and accountability to current and future generations. We are committed to fostering mutually beneficial and long-term relationships by supporting our communities with initiatives that are focused on future generations. As part of the plastics industry, we raise awareness and engage our employees to contribute to environmental activities and aim to enhance the health and well-being of young and disadvantaged children. Besides these initiatives, we also respond to the most pressing needs of the communities by active volunteering or by providing financial assistance.

The spread of COVID-19 was, and continues to be, a global concern, particularly affecting vulnerable and disadvantaged members of society. As a concerned corporate citizen, we also stepped up to respond to the crisis to make a meaningful and valuable contribution to local communities.

OUR INITIATIVES

COMBATING COVID-19: CARING FOR COMMUNITIES

The outbreak of the pandemic led to a global shortage of protective medical equipment such as surgical masks, protective suits, and safety goggles to control the outbreak.

To help curtail the spread of the virus, we donated 20,000 single-use facemasks to be distributed across Foshan and Ningbo districts in China.

We gave over 1300 kg of Terluran® ABS to Friedrich-Alexander-University Erlangen-Nuremberg, Germany to help produce protective glasses for frontline healthcare workers at the university clinic and other healthcare institutions in the area. Within four weeks, the team at the FAU produced 100,000 pairs of protective glasses.

In Ontario, Canada, we responded to a demand and provided personal protection equipment to protect local healthcare workers

from respiratory hazards within their workplace. Our Americas headquarters in Aurora, Illinois sent face shields to frontline healthcare workers in New York City, Chicago and surrounding suburbs, and the hard-hit Navajo Nation community, within Arizona, USA. We also gave a USD 10,000 (over EUR 8700) donation to local Chicago-area food banks.

To combat the outbreak, employees and contractors immediately took proactive steps to implement safety measures. A colleague from our Sarnia site used a recipe published by the World Health Organization (WHO) to create liquid hand sanitiser in her very own kitchen, which she then donated to front-line workers. We also delegated a business development manager responsible for healthcare and packaging to support our parent company

INEOS in producing hand sanitisers. In association with a sanitation provider, we facilitated a disinfection project in Godhra, adjacent to our plant in Katol, India. This project, which also included monetary support to the local communities, has protected 150,000 residents by helping contain the spread of COVID-19. This project, which also included monetary support to the local communities, has protected 150,000 residents by helping contain the spread of COVID-19.

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COMBATING COVID-19: CARING FOR COMMUNITIES

The INEOS Community Fund of GBP 1 million was established by INEOS Chairman Sir Jim Ratcliffe in March 2020. The fund enables

INEOS sites across the world to support charitable organisations during this particularly difficult time.

Below are the organisations to which we have donated up to EUR 10,000. We hope that this contribution with help them in carrying out vital work in their local communities.

INEOS Community Fund donations to combat COVID-19

LOCATION	ORGANISATION
Foshan, China	Jinben Primary and Jinben Middle Schools
Singapore	Singapore Food Bank
Antwerp, Belgium	Maud&Co, Bring a Smile, Hearts 4 Mercy
Cologne, Germany	Förderverein für krebskranke Kinder e.V.
Frankfurt, Germany	School@Home
Ludwigshafen, Germany	Deutsche Leukämie-Forschungshilfe – Aktion für krebskranke Kinder
Sao Paulo, Brazil	Associação de Apoio à Criança com Câncer
Sarnia, Canada	Canadian Mental Health Association of Lambton-Kent, St. Clair Child and Youth Services
Mexico City, Mexico	Ayuda y Solidaridad con las Niñas de la Ca
Aurora, Illinois, USA	Boys and Girls Club of Chicago
Bayport, Texas, USA	Today's Harbor for Children
Texas City, Texas, USA	The Salvation Army Galveston County

CLEANING UP MARINE LITTER

To complement our recycling efforts to raise awareness, reduce pollution of plastic waste and help protect the local marine wildlife and habitat, volunteers from INEOS Styrolution support the local community by participating in clean-up initiatives.

Mexico City, Mexico

Volunteers from our Mexico City office conducted a clean-up at the heavily polluted, El Capulin Dam in Mexico City. The team's hard work resulted in the collection of 1500 kg of litter, which they stopped from making its way into the Gulf of Mexico.

Aurora, USA

About 50 volunteers from our Aurora office spent the day at a local park cleaning-up and disposing of litter responsibly. Working alongside the Fox Valley Park District, the team also performed landscaping activities creating a beautiful and clean environment within their local park for the whole community to enjoy.

Sarnia, Canada

Volunteers from our Sarnia office worked with the St. Clair Conservation Authority, cleaning the environment and planting trees at the Dow Wetlands. Colleagues from Sarnia also participated in the 2019 clean-up of Aamjiwnaang First Nation event, an annual Earth Day celebration to strengthen relationships within the community.

São Paulo, Brazil

A volunteer group of employees and their family members from our São Paulo, Brazil, office conducted a clean-up effort at Praia Branca, on the coastline of São Paulo state. The team established a partnership with the organisation Instituto EcoFaxina, which performs clean-ups at beaches, mangroves, and conservation areas.

Antwerp, Belgium

Colleagues from our site in Antwerp, Belgium, joined a big clean-up initiative in the Galgeschoor nature reserve, where 8.2 tonnes of litter were collected. This clean-up is organised annually just before the breeding season by the Port of Antwerp and Natuurpunt Antwerpen Noord. The reserve is a tidal saltmarsh area on the banks of the Scheldt estuary, and a nesting area for many species of migratory birds. Due to the varying salt content, this reserve is also a habitat for specially adapted plants, and while the mudflat may look uninhabited, under the surface, it is crawling with life. The recycling company Indaver, will process part of the collected litter and either sort it for re-use or incinerate it to recover energy. We also cooperate with Indaver to recycle post-consumer polystyrene waste back into feedstock for reuse.

Ludwigshafen, Germany

Employees from our production site in Ludwigshafen, Germany, did their first clean-up initiative on a 5 km route along the Rhine river.



Volunteers from our office in São Paulo, Brazil, conducted a clean-up effort at Praia Branca, on the coastline of São Paulo state



The clean-up was coordinated with the local disposal companies, which also handed out their working materials. The team collected 20 bags of trash, mainly plastic waste and cigarette butts.

Map Ta Phut, Thailand

About 90 volunteers and their families from our Thailand office participated in the annual International Coastal Cleanup (ICC), alongside 3,000 volunteers from 32 companies. This initiative, led by Ocean Conservancy, is the world's largest volunteer effort to clean up the ocean, waterways, and coastlines, to help protect local marine wildlife and habitats. About 97 tonnes of litter was collected along the 15 km long coastline from Rayong's Suchada Beach, to Ban Chang's Nam Rin-Payoon Beach.

READY, SET, GO RUN FOR FUN

We aim to motivate young kids to get involved in sports and enjoy a healthy, active lifestyle on into adulthood. This is why we support our

Go Run For Fun, Frankfurt, Germany



parent company INEOS with their global GO Run For Fun (GRFF) campaign. With more than 287,200 children participating since its inception in 2013, the GRFF is the world's largest running series for children, encouraging young people's participation in sports.

In 2019, we further expanded our GRFF series and hosted events in all three regions. We staged six events with nearly 2,000 elementary school students between the ages of 5 and 11 participating in these runs. These events took place in Frankfurt, Addyston, Singapore, and for the first time in Vadodara, India.

Colleagues from our European, American and Asia-Pacific offices and production sites volunteered as track marshals to ensure the kids' safety.

INSPIRING KIDS AND YOUTH ABOUT SCIENCE

As the leading global styrenics supplier, we want to inspire interest in polymer science among young students at an early age. We organised a training session for 90 children in Antwerp with "Kunos coole Kunststoff-Kiste", an experimental kit for child-oriented scientific experiments. This helps them explore the wide variety of properties and applications of plastics.

Beyond our efforts in primary schools, we support several programmes that encourage university students with scholarships to pursue these sciences and explore its career possibilities.



Go Run For Fun, Vadodara, India

IMPROVING GREEN SPACES

We support the "Moxi Green Zone" project in India together with 1,000 people from the Moxi village in India. Through this initiative, we created a green community area for the public by refurbishing a garbage dump near a local pond, planting saplings and connecting a water source to the green zone for watering the plants and creating a walkway for joggers.

We also financially supported the Sujalam Sufalam waterbody recharge scheme in Katol, India. The Government of Gujarat repaired and developed the water bodies to hold more rainwater. This reduces the dependency on ground water for daily use and irrigation, and helps retain and replenish the groundwater table.

We also erected four new green zones in the industrial area around our production sites in Nandesari and Moxi, India. The green zones are built on a wasteland and around an effluent canal. These green zones absorb excessive CO₂, help reduce smog and balance the natural biodiversity in the area. These zones

benefit nearly 2,000 residents and over 5,000 workers in the industrial areas around Nandesari and Moxi.

We constructed a rainwater-harvesting tank at the Dodka village elementary school near Moxi. The tank has a 1000 litre capacity and surplus water is connected to a borewell to recharge water table underground. This system makes the school self-reliant, using rainwater as drinking water and for cleaning needs for 500 children and staff.

We also installed a reverse-osmosis water purifier in Katol to give clean and cold water consumption for nearly 300 children.

In Seoul, South Korea, our colleagues and their families planted 600 trees along the banks of the Han River. This activity was done in coordination with the Environmental Action Association Korea and to both promote teamwork and create a green space through this reforestation.

[Visit our website for an overview of our community involvement activities globally](#)

MANAGING OUR BUSINESS RESPONSIBLY



ENSURING FAIR BUSINESS PRACTICES >

MAKING SUSTAINABLE GROWTH A REALITY >



ENSURING FAIR BUSINESS PRACTICES

We operate with a fundamental respect for the rights of the individual, our employees as well as business partners. We are firmly opposed to all forms of human rights violations or deficient labour conditions, and expect this across our value chain.

OUR APPROACH

INEOS Styrolution, with the strong support of its senior management, is dedicated to maintaining a high standard of corporate governance and regularly articulates the company's policies on business integrity and human rights. We believe that high standards on business integrity and human rights are critical to deliver our strategy, create long-term value and maintain our licence to operate.

We are committed to complying with all relevant local, national and international laws, as manifested in our own values and guiding principles. Our globally defined policies and standards to some extent even exceed the requirements of local laws, and we strive to live up to the highest standards of business practice regarding ethics, integrity and

transparency. We will not compromise our safety, health or environmental standards for any reason, including profit or production. We continue to refine our policies, increase awareness and understanding of these among employees and business partners, and enforce compliance in accordance with the policies' intent. In our materiality assessment undertaken in 2017, human rights and business integrity were rated as being of high significance to our stakeholders and of strategic importance to our business.

OUR GLOBAL COMPLIANCE PROGRAMME

We have in place a Compliance programme with an organisational framework at global, regional and country levels to ensure that INEOS Styrolution always operates as a responsible corporate citizen everywhere. The Compliance programme is strongly supported by the Risk & Control programme. The cornerstone of our Compliance programme is the INEOS Styrolution Code of Conduct. Acting in accordance with this Code of Conduct is a prerequisite for each of our employees. To ensure that all employees fully understand our policies, the Code of Conduct has been translated into selected relevant languages and is posted on our intranet. In addition, our entire

active employee base is trained on its content at a minimum every two years. A quarterly publication, summarising policy updates and information about ongoing compliance events, is provided by the CEO and emailed to employees. In addition, an internal newsletter on compliance topics is regularly issued, which highlights the policies, explains new updates, and provides concrete examples of compliant and non-compliant behaviour.

INEOS Styrolution maintains four compliance teams: one team for each of the three regions

and one global team. Each of these teams is made up of a representative from Legal, Business, Human Resources, SHE and Finance. Members of other departments participate occasionally as members of the extended team.

The Chief Compliance Officer of the company, reporting directly to the CEO, chairs the global team, as well as oversees and manages regulatory compliance issues, ensuring that the company complies with both its internal policies and its outside regulatory requirements.

Compliance team roles and responsibilities





OUR PERFORMANCE

Key highlights

- **Biennial training** of entire active employee base on **Code of Conduct** launched
- Global training on **data protection** conducted
- Procedure for **data protection breach** launched

HUMAN RIGHTS

We focus on identifying and managing human rights-related risks in all our activities. Thorough due diligence is performed to mitigate those risks, and we seek to remediate any possible adverse human rights impacts that we might have caused or to which we might have contributed. We set minimum mandatory requirements for all our suppliers and relevant contractors on topics such as freedom of association, non-discrimination, fair treatment of employees, and zero tolerance in relation to child labour, forced labour and modern slavery.

Although the chemical and plastics industry is not usually prone to these human rights-related risks, we are vigilant to prevent it and have set clear criteria in the Code of Conduct as well as the Supplier Code of Conduct.

Key actions

- Online refresher **training on anti-bribery, anti-corruption and anti-money-laundering**

CHILD LABOUR

According to the Code of Conduct and Supplier Code of Conduct, only persons who are at least 15 years of age or the applicable minimum legal age, whichever is higher, may be engaged as employees. Legitimate workplace apprenticeship programmes for educational benefit may be provided that are consistent with Article 6 or 7 of ILO's Minimum Age Convention No. 138. Employees are free to terminate their employment upon reasonable notice. We ensure that there are no unreasonable restrictions imposed on movement within the workplace or upon entering or exiting company-provided facilities.

FORCED OR COMPULSORY LABOUR AND MODERN SLAVERY

All work performed for INEOS Styrolution has to be voluntary. There is zero tolerance for trafficking of persons or the use of any form of forced, bonded, slave or prison labour. No employee or contractor can be required to surrender any government-issued

identification, passports, work permits or travel documents as a condition of employment. Contracts and human resources policies clearly mention the conditions of employment in explicit language understood by our employees. All our operations are assessed with a view to comply with our human rights policies, which are mirrored in our human resources policies.

ANTI-BRIBERY, ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING

Anti-corruption and anti-bribery is included in the Code of Conduct and consequently brought to the awareness of INEOS Styrolution's employees. Further information on this topic is embedded in the anti-bribery and corruption policy (also covering the main areas and expectations of money laundering regulations). This policy specifically includes – as already contained in the Code of Conduct – a clear statement that no gifts or entertainment of any kind may be offered to any politician, political party or any politically exposed persons.

In addition, a compliance due diligence checklist has been issued clarifying the need for information, when dealing with identified high-risk countries (in line with the corruption perception index issued by Transparency International) and introducing certain requirements when identifying and selecting

agents and other representatives of INEOS Styrolution. All relevant employees were trained on anti-bribery, corruption and money laundering in 2018, and relevant new recruits are assigned to the training as part of their on-boarding. Anti-bribery and anti-corruption was also one of the subjects highlighted in the 2019 Code of Conduct training.

ANTI-COMPETITIVE BEHAVIOUR

All employees are prohibited from entering into any discussions, formal or informal agreements or understandings with competitors that may restrict competition. Vigorous competition, free from collusion and unreasonable restraint, is the most effective mechanism to ensure that we provide high-quality and well-priced products and services. Failure to comply with competition, antitrust and other trade regulation laws in any jurisdiction in which we conduct business could result in serious consequences, for both our company and the offending individuals, including significant civil and criminal penalties.

We encourage and support employees in familiarising themselves and complying with the competition laws relevant to their role and their business. For employees whose job function puts them at risk of non-compliance, further guidance is provided through regularly repeated, mandatory training on policies



related to compliance with antitrust and competition law.

We have in place a policy related to interaction with competitors that defines certain reporting and filing requirements. In 2018, a global online training on antitrust was provided to relevant employees including senior management, account managers and sales managers. In 2019, relevant individuals received a refresher training prior to large trade shows.

INTERNATIONAL TRADE

Our international trade policy outlines the areas in which national and international laws and regulations can impact our business. The policy also introduces certain requirements on due diligence for interacting with third parties, such as customers, suppliers or agents, particularly if located in or transacting into and out of certain listed countries. Selection of countries is based on issued and active trade restrictions, on the corruption perception index issued by Transparency International, as well as an IT screening tool that has been rolled out globally to support such due diligence processes electronically. Should there be any doubt about the propriety of any trans- action or course of conduct, the Code of Conduct instructs employees to contact the Legal department immediately for direction.

INFORMATION AND CYBER SECURITY

We have implemented an information and cyber security programme to protect the data and IT environment of our company and employees, as well as that of our customers and business partners, from any kind of security-related threats.

The IT department is part of the enterprise risk management and performs regular IT risk assessments and audits of our internal IT control system. Our IT security-related policies and processes are based on the ISO 27001 standard and the NIST framework. One of our main goals is to be compliant with applicable laws, regulations and contractual obligations, especially to the European General Data Protection Regulation (GDPR). We have the claim to provide and verify end-to-end security in all aspects of our IT environment, starting with client and server security up to vendor risk management and internal audits.

Together with our cyber security team, we provide more in-depth IT security to our existing security landscape and establish more sophisticated protection against external and internal threats. We perform a global IT security awareness training on an annual basis, comprising internet and email attacks, especially phishing and social engineering. As part of our global IT security incident response

management process, we also implemented an easy way to report and react to these kind of threats within our company. We also engage an external company to check our data security by attempting to “hack” into our systems.

DATA PROTECTION

Due to the adoption of the GDPR, a major reform designed to strengthen and unify data protection, we have introduced a global data protection policy. In addition, we ensured that our current practices are re-assessed, documented and shared, in order to meet the requirements of the GDPR as it came into effect in 2018. Standard employee statements related to data protection as well as the templates for “commissioned data processing” have been reviewed and updated in line with the GDPR. To strengthen the understanding of data protection within the organisation and inform about the meaning of the GDPR, all relevant employees were provided training in 2019.

MANAGING COMPLIANCE VIOLATIONS

Since 2014, we have a reporting mechanism in place with an independent provider operating a standardised compliance hotline accessible by phone, email or via the internet, which also offers response in various languages. This anonymous hotline is available at all times

(24 hours a day, 365 days a year) and is free of charge to the caller. Each call received on the compliance hotline is categorised and tracked according to a variety of criteria, including labour and business practices as well as human rights issues.

In 2019, all reports received via the compliance hotline were fully investigated and resolved. The reported issues were related to labour practices and business practices. None of the calls were related to impacts on society or human rights.

To the best of our knowledge, in 2019, in none of INEOS Styrolution operations, were cases of human rights abuse, child or forced labour, corruption, or incidents in anti-competitive behaviour identified. We can also confirm that, to the best of our knowledge, we did not incur any justified cases of employee discrimination in 2019.



MAKING SUSTAINABLE GROWTH A REALITY

We take an integrated approach to deliver a strong sustainability performance that benefits both our customers as well as society. We are convinced that truly sustainable business management is a prerequisite for accomplishing growth and long-term success – for our customers and ourselves.

OUR APPROACH

INEOS Styrolution looks at sustainability as a genuine driver of growth and value and is embedded in our Triple Shift growth strategy. As the name suggests, the strategy is a commitment to three essential elements:

- a focus on and split across all focus industries
- the company's strong dedication to its styrenic specialties business
- Improved global presence with a special focus on growth regions

In the first shift, we place a stronger focus on five higher-growth industries, namely automotive, electronics, healthcare, construction and household. Growth of

these industries is supported by global megatrends, such as resource efficiency, need for mobility and demographic change.

The second shift refers to a stronger focus on higher-value specialties and ABS standard products and is reflected in INEOS Styrolution's broad portfolio of more than 1,500 high-performance and value-added products, a large number of customised solutions, comprehensive service packages and a close relationship with key customers and external partners.

Finally, our global presence enables a shift towards high-growth regions. This move includes strategically investing in growth markets by expanding assets and sales footprint, particularly in Asia-Pacific and the Americas. Global production and supply footprint is continuously strengthened, enabling local sourcing for customers and providing them with greater supply security. This also has a beneficial impact on the company's environmental footprint.

We carefully listen to our customers' needs, continuously engage in collaborative innovation, and position sustainability as an integral part of our business management

activities. We are constantly optimising our economic, environmental and social performance to deliver safe, best-quality and high-performance products that eventually render our customers' businesses as well as end consumers' choices more sustainable.

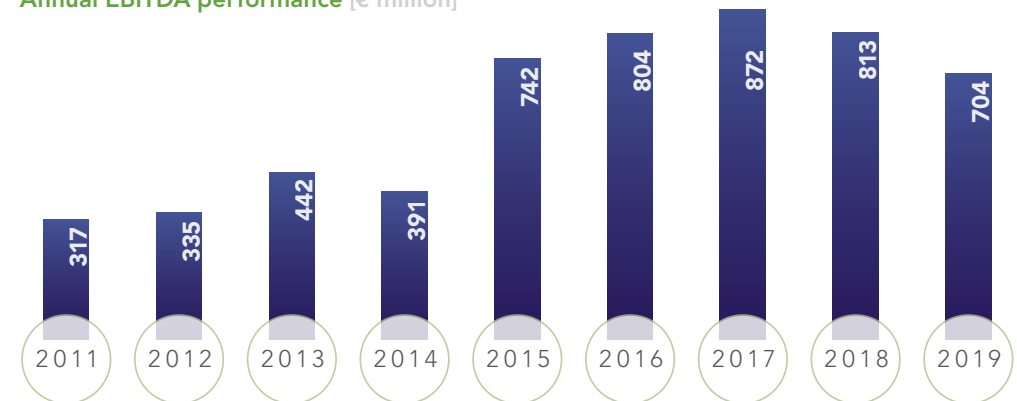
Our Triple Shift Strategy has proven to be a sound guideline for the company for many years – and we expect it to guide us for many more years to come. We do and will continue to revisit our strategy on a regular basis, but we do not expect short-term impacts and disruptions such as the Coronavirus pandemic in 2020 to result in significant changes to our successful long-term strategy.

OUR PERFORMANCE

We believe that sustainable management and operations are the basis of our business success. Since our foundation in 2011, we have significantly strengthened our competitiveness in many business areas and have continuously delivered a strong business performance.

Today, we are the leading global styrenics supplier with access to customers in growth industries, such as automotive, electronics and healthcare. We are well-positioned in the higher-value ABS standard and specialties markets and have a strong asset footprint globally. We can rely on our broad product portfolio, considerable intellectual property

Annual EBITDA performance [€ million]





and our world-scale commodity manufacturing platform with best-cost technology. We are leveraging these strengths to the benefit of our customers.

Our ability to transform our industry position into solid financial results, as shown in the graph, enables us to develop the company further and invest into the future.

STRATEGIC INVESTMENTS

Our investment decisions and growth strategy are guided by an emphasis on sustainable business practices.

In 2019, we completed the acquisition of two polystyrene plants in Ningbo and Foshan, China. As part of our due diligence, we undertook an environmental and social impact assessment of both sites. This acquisition of 400 kilotonnes of annual capacity has significantly increased our manufacturing footprint in Asia, and allows us to better serve our existing customers in the region using locally produced materials.

We have also embarked on a plan to construct a green field ABS plant adjacent to the polystyrene site in Ningbo. The plant will have an estimated annual capacity of 600,000 tonnes. Construction is planned to start in 2020, with completion expected in 2023. As sustainability is a key factor for our business, our environmental policy has been implemented for the project right from the



Groundbreaking ceremony for our new 100kt ASA plant in Bayport, Texas, USA

beginning. During the engineering phase, sustainability and energy assessments have been performed internally as well as with INEOS experts. Based on process knowledge from our existing plants, we included best technology design changes to reduce energy, CO₂, water, waste and air emissions where possible and in accordance with local regulations. We have improved the water concept and included further re-looping to reduce water and waste water consumption. Best practices from the Operation Clean Sweep® (OCS) programme have been included and will be taken up again in the last phase of design.

The Moxi 100-compounding expansion project in India has added two new lines to achieve a combined 100 kilotonnes per annum capacity at the site. In addition, the project

also consists of a number of features to improve sustainability. This includes: a newly installed sewage treatment plant to treat domestic wastewater and using it for gardening at the site, acoustic enclosures for all blowers to reduce noise pollution, premium efficiency motors to save energy, LED lights leading to more than 50% energy saving compared to conventional lights, air conditioners with environmentally friendly refrigerants, and a defined circular route for safe movement of finished goods and raw material vehicles within the site.

In Europe, we are investing in a new ABS production line at our site in Wingles, France, to meet the growing demand for ABS. We expect this line to be operational by the end of 2020.

We are also expanding our ABS and ASA capacity in the Americas through the construction of a new 100 kilotonne capacity ASA plant in Bayport, Texas, USA, which is expected to be operational in 2021. The development of this new site is part of our bigger expansion plan for the Americas, which includes increased ABS capacity at the Altamira site in Mexico, while transitioning ASA production to the new site in Bayport. This additional capacity will allow us to produce more product locally and avoid the need to import ABS and ASA from other regions. As the plant is also adjacent to our largest styrene production facility, it will allow us to receive styrene, our largest ASA feedstock, via pipeline instead of transporting it by ocean vessel.

As part of our shift to a circular business model, we are working with several leading-edge technology providers in North America and Europe to further advance a circular economy for polystyrene. We are combining state-of-the-art technologies from these technology providers such as Agilyx, Indaver, GreenMantra, Pyrowave, and Recycling Technologies with our own manufacturing expertise to convert waste polystyrene back into feedstock, and thus divert this material from landfill or incineration.

We are also investing in two advanced recycling facilities: one near our production site in Channahon, USA, and the other in Antwerp, Belgium.



The facility in Channahon, Illinois, will use proprietary technology from Agilyx, a technology leader that focuses on converting waste polystyrene via depolymerisation. Agilyx has already secured the sourcing of waste polystyrene to be used as feedstock. The plant will be capable of recycling up to 100 tonnes of polystyrene waste per day after its scheduled completion in 2023.

Under the umbrella of the industry association Styrenics Circular Solutions (SCS), we have combined resources with another SCS member to advance the development of a commercial-scale recycling plant in Europe, capable of processing up to 50 tonnes of post-consumer polystyrene feedstock per day.

We are also collaborating with Indaver, a European waste management company with large-scale treatment facilities in the port of Antwerp to advance depolymerisation of polystyrene in Europe. Indaver is currently setting up a demo-installation in the port of Antwerp, with a recycling capacity of 15,000 tonnes a year and is scheduled to be operational in 2022.

In parallel to our strategic investments in our facilities, we continue to improve our product portfolio to ensure it is more sustainable and resource-efficient. In 2019, we launched a brand-new range of sustainable products called INEOS Styrolution ECO.

INEOS Styrolution ECO products include products based on mechanically or chemically recycled post-consumer waste and materials based on bio-attributed feedstock. This new family of solutions will reduce the amount of post-consumer waste going to landfills, significantly reduce greenhouse gas emissions, support the recycling of post-consumer waste, and efficiently use existing resources.

For more information on INEOS Styrolution ECO, please visit: www.styrolution-eco.com

OUR RISK & CONTROL PROGRAMME

INEOS Styrolution is exposed to various risks that could impact the achievement of its corporate objectives. In order to identify, assess, monitor, and mitigate these risks, a company-wide Risk & Control programme was established and is continuously developed further. The scope of the programme covers six pillars reflecting the company's main business areas: Strategy & Business, Finance, Compliance, Operations (including SHE), Human Resources and IT. This programme is embedded in a three lines of defence model as an integral component of our governance, management and operations.

THE THREE LINES OF DEFENCE

FIRST LINE OF DEFENCE

The first line of defence is undertaken by operational management, initiated by the pillar heads, who are responsible for implementing

The six pillars of our risk & control programme



and maintaining effective internal controls for their respective area of responsibility and for executing Risk & Control processes on a daily basis. Operational management is also responsible for implementing corrective actions to address control deficiencies.

SECOND LINE OF DEFENCE

The second line of defence is undertaken by the Compliance team, the Risk & Control department and the Risk Management Committee. The latter acts as the reporting medium for this line of defence. Compliance monitors various specific risks, such as non-compliance with applicable laws and regulations.

To strengthen the company's governance structure, a Risk Management Committee has been established with representatives from each of the six pillars. This committee meets

periodically to monitor the risk management process and drive continuous improvement within the programme. The Risk & Control department coordinates this on a daily basis. Risks are identified and assessed by considering impact and likelihood through risk workshops and risk assessments

Controls are then implemented to mitigate the identified risks. Annual control testing is performed within each pillar to determine if controls are well-designed and operating effectively. All controls are tested on a three-year-rotational basis. Results are reported to the CEO, CFO and Risk Management Committee members on a regular basis.

Our Risk & Control programme covers a sustainability risk, which is also reflected in our

Risk management process





Risk & Control matrix. This risk is ranked in the top ten key risks of the company, showing its increasing importance and potential impact. Controls have been set up to mitigate these risks and are part of the above-mentioned control testing.

THIRD LINE OF DEFENCE

The third line of defence is undertaken by our Internal Audit department. Internal audits are performed based on an annual audit plan, which is approved by the management board. The audit plan is based on a risk approach and covers all our entities and business functions. The scope of each audit is defined by the Internal Audit department in coordination with

the management board. Audits cover control testing as well as sample-based testing. The Internal Audit function reports functionally to the CEO and CFO.

For Risk & Control activities, we use an SAP-based tool that is integrated with the company's Enterprise Resource Planning (ERP). The tool can monitor real-time data in ERP under the pre-defined rules set up by our six pillars and Risk & Control. These automated controls (called continuous control monitoring or CCM) allow real-time monitoring, and can detect any exception to controls when these occur, shortening issues identification and ultimately enhancing the internal control system.

The three lines of defence



COMBATING COVID-19: RISK & CONTROL

Our Risk & Control matrix was comprehensively reviewed by the Risk & Control team together with the Risk Management Committee to evaluate preparedness to address COVID-19-impact on business activities and processes in all pillars.

Major risks affected by a pandemics outbreak are reflected in our company's risk & control matrix, and addressed by remediating controls, which are tested for design and operating effectiveness via annual control testing activities.

These risks and controls, include, but are not limited to:

- Risk from global economic conditions, addressed by controls such as
- Finance: customer credit reviews, regional credit management guideline, country risk monitoring
- Strategy & Business: review early warning indicators of a downturn, tight management of finished goods inventories
- Risk from supply shortage or non-in time (Strategy & Business): manage and keep

target safety stocks – critical feedstock, supply chain strategy review, monitoring of supplier financial position

- Risk arising from external/ internal crisis communication (Operations): transportation/ safety guidelines, global crisis management plan
- Risk arising from inadequate business continuity management (IT): Business continuity plan is in place and tested frequently, disaster recovery plan, backup and recovery processes
- High turnover and recruiting challenges/ employees calling ill due to pandemics outbreak (HR): succession planning for key positions.

The Risk & Control community continuously monitors risk and control activities and reviews for necessary enhancements for the risk & control matrix to address any additional risks coming up with potential impact on our company's business activities.



ABOUT THIS REPORT

This report has been prepared in accordance with the Global Reporting Initiative's (GRI) Standards core option. The collected data provides an overview of our sustainability efforts between January 1 and December 31, 2019, and covers the activities of all INEOS Styrolution legal entities worldwide, which fell within the scope of the company's consolidated financial statements as of December 31, 2019. For the avoidance of doubt, this excludes the activities of INEOS ABS, Addyston, USA.

The financial information presented in this report is consistent with the company's audited consolidated financial statement and management report for the year ending December 31, 2019, which was prepared in accordance with International Financial Reporting Standards (IFRS) and interpretations.

This report has been published on August 31, 2020. The previous year's report was published on September 16, 2019. INEOS Styrolution has published sustainability reports since 2015, all of which can be downloaded from the company's website.

All internal stakeholders accountable for the company's sustainability programme and performance, including the management board, have validated the content of this report.

For more information on our sustainability approach and actions, please write to INSTY.sustainability@ineos.com or visit our website at www.ineos-styrolution.com





GRI INDEX

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