

INEOS USA LLC d/b/a INEOS Olefins & Polymers USA 2600 South Shore Boulevard Suite 500 League City, Texas 77573

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## Statement on Forced Labor, Child Labor, Modern Slavery, and Human Trafficking

## (annual reporting in accordance with Bill S-211)

INEOS is a global conglomerate of 30 businesses encompassing petrochemicals, specialty chemicals, and oil products, with 173 sites in 32 countries throughout the world, as well as consumer brands and sports interests. INEOS's products form the basis of industries that touch and improve much of daily life – from medicines to mobile phones, from agriculture to automotive, from textiles to construction and technology, including the components essential for renewable energy.

INEOS USA LLC, under the trade name *INEOS Olefins & Polymers USA*, and in conjunction with its various subsidiaries, is a major, integrated manufacturer of petrochemical products in North America, from to NGL fractionation, to olefins and polymers production, to downstream pipe conversion, with approximately 2,000 employees across thirteen 14 manufacturing sites (including a joint venture) in 8 states. End uses of INEOS Olefins & Polymers USA's products include:

- automotive fuel tanks and components
- · caps and closures (including recycled)
- construction materials
- · dairy bottles
- food and beverage containers (including recycled)
- household and leisure wares
- High-performance high-density polyethylene (HDPE) pipe
- · medical packaging and devices
- pharmaceutical and household containers
- · synthetic rubber
- · textiles

The principals of INEOS, Sir James Ratcliffe and Messrs. Andrew Currie and John Reece, as well as the governing board of INEOS Olefin & Polymers USA, are committed to the abolition of forced labor, child labor, modern slavery, and human trafficking. Included in this statement are the steps INEOS Olefins & Polymers USA has taken during the previous year, under the umbrella of INEOS, to ensure that forced labor, child labor, modern slavery, and human trafficking are not taking place in its business and supply chain.

- INEOS maintains and enforces business conduct and ethics policies posted at:
  - www.ineos.com/sustainability/governance/policies-and-codes/code-of-conduct
  - www.ineos.com/sustainability/governance/policies-and-codes/supplier-code-of-conduct
  - www.ineos.com/sustainability/governance/policies-and-codes/anti-slavery-act
- INEOS conducts annual training specific to preventing human trafficking and forced labor
- INEOS surveys its suppliers and service providers via written questionnaire
- INEOS utilizes a reputable third-party vendor to screen its suppliers and service providers





 INEOS maintains both an Internet-based and telephonic service for employees to anonymously report compliance issues

INEOS has not had to undertake measures to remediate any forced or child labor in its businesses or supply chains and as such, has not had to remedy loss of income to any groups vulnerable to forced labor, child labor, modern slavery, or human trafficking.

INEOS is committed to ensuring its people are valued, and human rights are respected, throughout its operations.

The foregoing is true and correct to the best of my personal knowledge.

CHARLES T. SAUNDERS

General Counsel and Secretary

**INEOS USA LLC** 

d/b/a INEOS Olefins & Polymers USA