



DATA PRIVACY & PROTECTION NOTICE

The data privacy regulations of some countries require that a person making a report containing personal data must be notified of certain collection and retention practices regarding the information submitted by that person and must accept the terms and conditions for the use of this service.

Please note that we are only able to receive and process reports through this service if you confirm that you have read and taken note of this Data Privacy and Protection Notice and expressly consent to the processing of the reports and your personal information as described below by clicking the “I CONSENT” box. If you do not consent then you may not use this service to file a report and should contact your supervisor or local management or a representative of the HR, Legal or your Compliance Manager to report the matter.

The content of this notice applies to both the phone and web-reporting services. You will be required to give clear verbal consent if using the toll-free phone-based service.

1. General

This service is a web and phone-based intake system provided by INEOS to its employees for reporting suspected violations of laws or regulations, our Code of Conduct or company policies.

The service may also be used to report suspected violations of other matters. This service and the database in which the personal data and information that you may report is stored, are operated by NAVEX Global.

2. Use of this service

Use of this service is entirely voluntary. You are encouraged to report possible violations directly to your supervisor or manager, or to a representative of Human Resources, Legal, or Compliance, depending on the nature of the possible violation. If you feel that you are unable to do so, you may use this service to make your report.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company’s operations may result in decisions that affect others. Therefore, please only provide information that you believe is true. You will not be subject to retaliation from your organization for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not

be tolerated. The information you submit will be held in confidence except to the extent prohibited by applicable law or otherwise as necessary to investigate your report, in which case the information will be handled as sensitively as possible. You are encouraged to identify yourself in the event of follow up questions arising.

3. What personal data and information is collected and processed?

This service captures the following personal data and information that you provide when you make a report: (i) your name and contact details (unless you report anonymously); (ii) the name and other personal data of the persons you name in your report if you provide such information (i.e.: description of functions and contact details); and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident. Note that your personal information will be held in confidence and will only be disclosed as set forth in this notice.

4. How will the personal data and information be processed after your report and who may access personal data and information?

The personal data and information you provide will be stored in a database which is located on servers hosted and operated by NAVEX Global in the United States. NAVEX Global has entered into contractual commitments with INEOS to secure the information you provide in accordance with applicable law including (for EEA countries) the European Commission's Standard Contractual Clauses for the transfer of personal information (for transfer to non-EEA countries) and the EU-US or Swiss-US Privacy Shield Framework as applicable. Personal data and information provided in a report may be transferred outside of the United Kingdom, the European Union, and/or the European Economic Area for processing and administration of this service. NAVEX Global is committed to maintaining compliance with applicable data protection requirements and adheres to stringent privacy and security practices. For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by the relevant personnel of INEOS, including HR, Finance, Legal, Compliance, management, external advisors (e.g. legal advisors), or, in limited circumstances, by technical staff at NAVEX Global.

Personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities. The relevant bodies that receive and process personal data can be in the US or in another country that may not provide the level of data protection available in the EU or other jurisdictions with more stringent data protection laws.

The personal data you provide will be kept as long as necessary to process your report, or, if applicable, as long as necessary to initiate sanctions or to meet legal or financial needs.

5. Accessing information concerning the report

INEOS will promptly notify any person who is the subject of a report to this service, except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information. Further, you have the right to request access, correction, or erasure of personal data or to object to its processing, or to receive a copy of the personal data held through this service. Any such request should be directed to your HR Manager. You also have the right to lodge a complaint with the relevant supervisory authority.

In some cases, the individual subject of the report may access information concerning the report, including the source from which the report originates, (but not the identity of the reporter), and request correction of personal data that is inaccurate or incomplete in accordance with applicable law. To make any such corrections, please contact the INEOS Group Company Secretary (yasin.ali@ineos.com) or the INEOS Group Legal Compliance Manager (charles.donkin@ineos.com).

6. Special provisions

Any SHE (Safety, Health, or Environment) issue MUST be reported to local line management as soon as possible consistent with established operating procedures of INEOS. Reports of SHE issues will ONLY be accepted by this service if the aforementioned report to local line management has occurred, or because either you believe that such report has not been fully investigated or recorded, or because you feel you cannot pursue it further with your local management.

This service is NOT an alternative to following the INEOS Staff Grievance Procedures. You are strongly urged to report any HR/Employment issues directly to your HR department/local management and use this service for Employment related matters only if you believe that you cannot report it via local management or that your report has not been fully investigated.

In some countries, anonymous reports may not be permitted under the law except under extremely restrictive circumstances.

I CONSENT

I have read, understand, and expressly consent to the processing of my personal information as described in this notice.