



**HUNTSMAN**

Enriching lives through innovation



Our Values:

# Huntsman's Formula for Success

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Huntsman Business Conduct Guidelines



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# Message from Peter Huntsman



Dear Huntsman Associate,

Over the last five decades, together we have built a strong and resilient legacy at Huntsman. At the heart of this accomplishment are two simple concepts—integrity and choice. We choose to do business the right way.

We choose to act with integrity for ourselves and we promise it to one another. It represents the most important commitment we make to our customers and shareholders. It is the foundation on which trusting relationships are formed and, over time, strengthened. Trust is as valuable as it is delicate. That's why it is so important that, collectively, we continue to make the right choices in how we conduct ourselves as professionals and as ambassadors of the company. No one is expected to know the answer for every business ethics issue that may emerge, but we are all responsible for knowing where to find the correct answers.

The information contained within our Business Conduct Guidelines is here to support you on this journey. Likewise, through the channels detailed in this guide, all Huntsman associates are responsible for speaking up if they witness something they believe is being done unethically—whether intentionally or unintentionally.

Living by these guidelines, along with good judgment and a commitment to doing business the right way, are what we need from all associates, every day, to maintain the highest ethical standards upon which our legacy is built and our future depends.

**Thank you for exemplifying our values in all that you do.**

A handwritten signature in black ink, appearing to read "Peter R. Huntsman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

**Peter R. Huntsman**  
Chairman, President, and CEO

# Our Values: Huntsman's Formula for Success

At Huntsman, our passion for who we are and doing the right thing gives us a competitive advantage in all our business endeavors. We are committed to our values of honesty, integrity, respect, and responsibility. This commitment unites us globally and fosters our high ethical standards in everything we do—especially in our relationships with each other, our customers, and our business partners. Each of us must live up to the Huntsman values so that we make the right decisions every day.





## Honesty

We are accurate and honest in all our communications.



## Integrity

We apply the highest standards of integrity in all our actions.



## Respect

We show respect and consideration to everyone with whom we interact.



## Responsibility

We are personally accountable for delivering on our commitments.

### Upholding Our Values Globally

These Guidelines apply to us all, regardless of where we work. We are expected to obey all laws at all times even though they may be complex and subject to change, and may differ from country to country. Though Huntsman does not expect everyone to be knowledgeable in all areas of the law, each of us is responsible for being aware of, understanding, and complying with these Guidelines and the policies, procedures, and laws that apply to our particular location and job function.





## Understanding Our Shared Responsibilities

Huntsman's reputation is built on the actions of everyone who acts on behalf of our Company. We share responsibility for upholding our values, and we expect everyone to follow our high ethical standards.

## Expecting Management to Lead by Example

Managers and supervisors are expected to lead by example. We believe this is the best way to promote Huntsman's values to associates as well as customers and business partners. As managers and supervisors, we are expected to:

- Act with the highest integrity and in full accordance with our values.
- Communicate the importance of these Guidelines and ethical conduct in general to our direct reports.
- Create a positive environment where our direct reports and other associates feel comfortable asking questions and raising concerns.
- Be alert to situations that may violate these Guidelines or the law.
- Promptly notify the appropriate individuals of any situation that is unethical or potentially damaging to Huntsman's reputation.
- Respect confidentiality and prohibit retaliation.

# Making the Right Decisions

At times, we may be unsure of what to do, or we may not know whether an action or decision is ethical or legal. In such situations, we should ask ourselves these questions:

- Am I adhering to our Guidelines, policies, and procedures, and all laws that apply to my area of work?
- What sort of guidance do I need before I can make this decision?
- Could Huntsman suffer any negative consequences due to my actions?
- Is there anyone at Huntsman who should know about my proposed or completed actions?
- Would I want my actions disclosed to the public? Would my family be proud of my actions?





## Speaking Up

If you still have a question about a particular situation, or need to report a problem or concern, you should contact one or more of the following resources:

- Your line manager
- Your local Human Resources Representative
- Your Facility Compliance Officer: <https://ethicsandcompliance.huntsman.com/en/contacts/facility-compliance-officers>
- Any Compliance Champion: <https://ethicsandcompliance.huntsman.com/en/contacts/compliance-champions>
- Ethics and Compliance Team: <https://ethicsandcompliance.huntsman.com/en/contacts/ethics-and-compliance-team> and [ethics@huntsman.com](mailto:ethics@huntsman.com)
- Chief Compliance Officer
- Legal Department
- General Counsel
- Speak Up hotline: [www.huntsman.com/speakup](http://www.huntsman.com/speakup) (refer to the Ethics and Compliance intranet site for country-specific phone numbers)

The Speak Up hotline is staffed by an independent company and is available in multiple languages, 24 hours a day, seven days a week. Reports can be entered directly into the Speak Up website or by talking to a representative. If a report is made using the hotline, the caller's identity will be kept confidential if requested, where allowed by local law, and the concern will be relayed to Huntsman for investigation.

Additional references to decision-making criteria and policy are made throughout these Guidelines. These and other important policies are available on our Ethics and Compliance intranet site: [huntsman.com/ethics](http://huntsman.com/ethics).

If any of us become aware of a situation that may involve a potential violation of these Guidelines, policies, procedures, or the law, we must report it promptly. Speaking up identifies illegal or unethical misconduct where it is occurring, keeps existing situations from worsening, and helps prevent misconduct in the future. Do not hesitate to raise a concern in good faith.

## Investigating Reports

Huntsman will investigate all reports of misconduct made in good faith. You are encouraged to provide your name when making a report because knowing the identity of the person reporting can often assist with the investigation. Confidentiality will be protected to the greatest extent possible while allowing for an appropriate investigation and resolution.

The following key points outline our approach to reports we receive:

**Prompt Attention.** Once a concern is reported, it is sent to our Ethics and Compliance Team. The report is assessed and referred for appropriate action or investigation by Ethics and Compliance.

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**Thorough Investigation.** Huntsman will quickly initiate an investigation, gather all available facts, and determine whether prohibited conduct has occurred.

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**Follow-Up Action.** Based upon investigative findings, Huntsman will take appropriate action to stop and prevent any further inappropriate or unethical conduct.

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**Allegations Taken Seriously.** All reports, including allegations of discrimination, harassment, and/or retaliation, will be taken seriously and promptly investigated in as confidential a manner as possible, although complete confidentiality cannot always be guaranteed.

**Expectation of Cooperation.** All associates are expected to cooperate fully and assist Huntsman in any investigation. An associate's failure to cooperate may result in disciplinary action up to and including termination of employment.

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**Appropriate Disciplinary Action.** Any associate found to be in violation of these Guidelines will be subject to appropriate disciplinary or corrective action up to and including termination of employment.

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**Supervisors or Managers Fail to Report.** Disciplinary action may also be taken against supervisors and managers who are aware of a complaint or inappropriate behavior but who fail to report or, where appropriate, take prompt action in response to such conduct.

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**Consequences of Violations.** Violations can have serious consequences, up to and including termination of the individuals involved and even civil and criminal penalties for those individuals and/or Huntsman.

## No Retaliation

Retaliation occurs when associates, applicants, or people closely associated with them are treated less favorably because they reported or raised an issue, or participated in a compliance investigation or litigation (such as serving as a witness).

Retaliation against any individual for raising a good-faith compliance issue or concern is prohibited. If you make a report in good faith, you will not be subject to disciplinary or other adverse action, even if the behavior you questioned proves not to be unlawful or unethical. "Good faith" means that you come forward with all the information you have to give a sincere, truthful, and complete report.

## Formulating Answers

**Q:** An associate on my team confided that he filed a report with the Speak Up hotline. He told me that his report involved our direct manager. Since then, I've noticed our manager treating him disrespectfully, and I suspect this may be due to the report. I'm not sure what to do. Is it best not to get involved? Should I remain silent about the issue?

**A:** No, you should report your concerns. Your manager's behavior may be a sign of retaliation. Because your suspicions are in good faith, you should make a report to your Facility Compliance Officer, the Ethics and Compliance Team, the Speak Up hotline, or another reporting resource. We do not tolerate retaliation, and reporting helps to prevent or stop retaliation.





# We Are Honest in Our Communications

We are always honest in our communications at Huntsman. This principle guides us as we interact with our colleagues, and as we market our products accurately, compete fairly, and deal with suppliers and third parties with integrity.

# Marketing Our Products

We market the products we make and the services we provide honestly, and with pride and transparency, because we know this builds confidence in Huntsman. Providing high-quality products and services is how we win business in the marketplace and maintain our reputation.

We never mislead customers and business partners about our products or services. We build trust through clarity and honesty. Because we value the relationships we build, we view all interactions with customers and business partners as opportunities to advance Huntsman.

## Our Formula for Success

We market our products honestly and effectively when we:

- Never misrepresent the capabilities of our products and services.
- Highlight the value of our products and services without disparaging competitors.
- Estimate and communicate implementation timelines accurately.
- Ensure our marketing and advertising materials are accurate and in compliance with all laws and regulations.



## Formulating Answers

**Q:** I work in the sales department, and I am close to meeting my quarterly goal. If I hit it, I will receive an individual performance bonus. Recently, negotiations became difficult during talks with a potential customer. To close the sale, I suggested the proposed work could be completed in a very short timeframe. I wasn't entirely sure this would be possible, but I thought that the client would not mind because the contract will not state that the earlier deadline is necessary. The deal hasn't closed yet, but I'm worried I may have misled the client. Am I doing the right thing?

**A:** If you are ever unsure about whether a commitment can be met, you must consult with a supervisor. Setting terms that Huntsman can realistically achieve is consistent with our values of honesty and integrity. We do not allow desired performance goals or quotas to compromise our ethical standards. Consult with a supervisor and communicate honestly with the potential customer if necessary. Clarify expectations early to avoid disappointing a customer and potentially harming our reputation.



# Competing Fairly

We compete vigorously and fairly in the marketplace and in compliance with all applicable laws. No amount of profit is worth sacrificing our values. We never compromise our ethical standards to gain a competitive advantage or meet a business objective. Violation of laws, including the antitrust laws, can have serious consequences.

## Our Formula for Success

We ensure fair competition when we:

- Collect information about our competitors only from public or other appropriate sources, and document those sources.
- Notify the Legal Department if we unintentionally receive a competitor's confidential or proprietary information.
- Never use deception or make inaccurate statements to limit competitive opportunities.
- Never recruit for the purpose of obtaining a competitor's information.
- Never sell at below-cost prices to drive competitors out of the market.
- Never discuss pricing, territories, or customers with competitors.
- Contact the Ethics and Compliance Team or Legal Department if we are unsure about a fair competition issue.
- Complete all required competition law training.

## Learn More

- Antitrust and Competition Policy
- Antitrust and Competition Policy iGuide

## Understanding Competition Law

Competition and antitrust laws ensure that markets for goods and services are competitive. These laws protect competition by prohibiting agreements, practices, and behaviors that decrease business efficiency, restrict innovation, or cause higher prices or lower quality of goods and services. The two key areas competition laws focus on are:

- **anticompetitive agreements and practices** and
- **abuse of a dominant position** in the marketplace.

Failure to identify and address competition law risks may have severe legal, financial, and reputational repercussions.

## Formulating Answers

**Q:** I have been invited to attend a golf event by a business partner. I think that competitors might also be attending. What should I do?

**A:** You should avoid contact with competitors at the event. Plan ahead by speaking with the event organizer to ensure you will not be grouped with competitors when playing golf. At the event, you should avoid informal social situations (like having lunch) with competitors. You should also check whether any additional approvals and training are required before you attend.



## Engaging with Suppliers and Third Parties

We show great respect when communicating with suppliers and third parties. We deal honestly and openly because our business depends on partnering with those who share our high ethical standards. As a global company with complex supply chains, we build and maintain relationships with those partners who provide the best value in accordance with our values and in compliance with law.

### Our Formula for Success

We ethically engage with suppliers and third parties when we:

- Treat all business partners fairly, regardless of the business value of the relationship.
- Base our decisions on objective criteria, such as quality, price, and service.
- Avoid even the appearance of a conflict of interest or any kind of favoritism (see [“Avoiding Conflicts of Interest”](#)).
- Never share confidential business information, from Huntsman or another company, without permission.
- Discuss issues openly and honestly when they arise to find a mutually acceptable solution.
- Conduct due diligence to ensure our business partners meet our high ethical standards.

### Learn More

- Anti-Corruption Policy
- Third Party Due Diligence section in the Anti-Corruption Policy iGuide

# We Bring Integrity to Our Actions

It isn't enough to believe in integrity—we must demonstrate integrity in all our actions. We show our integrity by avoiding conflicts of interest, preventing any forms of corruption, following the laws that govern insider trading and international trade, and maintaining the accuracy of our business records.



# Avoiding Conflicts of Interest

We make impartial decisions and act in Huntsman's best interests when doing our work. A conflict of interest occurs when personal interests interfere with our ability to make objective business decisions. Such conflicts can also impair our ability to work effectively on Huntsman's behalf. We never use our business information in a way that creates a conflict between our personal interests and Huntsman's interests.

## Our Formula for Success

We avoid conflicts of interest when we:

- Ensure that our business decisions are in the best interests of Huntsman, separate and apart from our personal interests.
- Promptly disclose any actual or potential conflicts of interest.
- Resolve or mitigate any conflicts of interest that cannot be avoided with our manager.
- Avoid pursuing business or other interests outside of Huntsman that may interfere with our ability to do our job.
- Avoid pursuing a personal business interest with a Huntsman competitor.

## Learn More

- Conflict of Interest Policy
- Conflict of Interest Policy iGuide



## Understanding Conflicts of Interest

A conflict of interest arises when an associate's personal interests interfere or may be perceived to interfere with Huntsman's interests or the associate's work-related duties. Areas where conflicts of interest often arise are as follows:

- A third party doing business with Huntsman is an associate's family member or friend, has some other relationship with the associate, or is financially involved with the associate.
- Being in a romantic relationship with another Huntsman associate.
- Working at Huntsman with an undisclosed family member or close friend.
- Taking an outside job, and especially one with a Huntsman business partner or competitor.
- Serving as an officer, partner, consultant, or manager with any organization doing business or seeking to do business with Huntsman.
- Using Huntsman's resources, including property, information, or time, to do outside work.
- Owning a significant financial interest in another company with which Huntsman does business. A "significant" financial investment is one that exceeds:
  - 1% of any class of the outstanding securities of a firm or a corporation,
  - 10% interest in a partnership or association, or
  - 5% of the total assets or gross income of an associate.

## Formulating Answers

**Q:** An associate has told me she set up a company for waste recycling services several months ago. The company now has several customers who are Huntsman competitors. Because Huntsman is not a customer of her business, she does not think she has to tell our line manager. I think there could be a conflict of interest here. What should I do?

**A:** The associate should have notified her line manager and Facility Compliance Officer before doing anything that may compromise her ability to make objective decisions in her Huntsman role. The associate should speak with her line manager and Facility Compliance Officer about this immediately so that any potential conflict of interest can be recorded and assessed. You should ask your line manager or Facility Compliance Officer to speak with the associate about this.



# Prohibiting Corruption and Bribery

We earn business on the merits and with integrity. We never seek to influence business decisions through inappropriate payments or favors. Anti-corruption laws carry potential criminal penalties—both for the Company and for you—and even the appearance of corruption can harm our reputation. No amount of profit is worth sacrificing our reputation. For this reason, all bribes or kickbacks, regardless of where we are located or doing business, are strictly prohibited.

## Our Formula for Success

We prevent bribery and corruption when we:

- Never offer anything of value with the intent to influence business decisions.
- Never offer anything of any value to a government official without prior approval of the Legal Department or Ethics and Compliance Team.
- Never offer or accept improper or suspicious payments.
- Keep complete, accurate records with all payments detailed honestly.
- Report any concerns about improper payments.
- Never use a third party to make payments we would not make ourselves.
- Perform due diligence to ensure we partner with businesses that share our values.

## Learn More

- [Anti-Corruption Policy](#)
- [Anti-Corruption Policy iGuide](#)
- [Delegation of Authority](#)





## Bribes, Kickbacks, and Facilitating Payments

A **bribe** is when someone offers something of value to another person with the intent to improperly influence a business decision or obtain a benefit improperly. Having another person or a third party offer a bribe on your behalf is the same thing as offering the bribe yourself.

A **kickback** is a type of bribe where some of the money improperly paid to a company is given back to a person to influence them.

The term **government official** is defined broadly. Employees of the government, public agencies, or state-owned or controlled businesses, as well as candidates for political office, are all considered government officials. In some countries, it may be unclear that a person is a government official. Anything given to a person who may be a government official, regardless of value, must be approved in advance by the Ethics and Compliance Team.

**Facilitating payments**, sometimes called “grease payments,” are usually small payments to speed up or “grease” transactions that don’t involve business decisions—for example, paying a government official for getting a permit or other services expedited or providing police protection. We do not make these payments anywhere we do business, even if they are acceptable under local law or custom.



## Giving and Receiving Gifts with Customers and Business Partners

On occasion, we may give or receive a gift or entertainment for a definite business purpose, provided that the value and frequency are not excessive. Huntsman's business interests are best served when decisions are based on commercial criteria and not influenced by a gift or entertainment. We should never give or accept anything that could impair, or appear to impair, our or another party's ability to exercise best business judgment in a fair and unbiased manner. We never give or accept the following gifts:

- Cash or cash equivalents (including discounts, loans, and gift cards)
- Lavish meals
- Equity, stocks, or bonds
- Reimbursement for non-business-related travel or lodging
- Expensive bottles of wine or liquor
- Inappropriate entertainment

## Formulating Answers

**Q:** A vendor offered me two premium-priced tickets to a FIFA World Cup match. The vendor said he does not want anything in return because he cannot attend. Should I accept the tickets?

**A:** The value of the tickets means this gift is only permitted with specific approvals. You would also need to seek guidance from your line manager on whether it is appropriate for you to accept these tickets or whether this gift should be politely declined.

**Q:** I heard my manager tell his friend that his new smartphone is a gift from his wife. But I know that smartphone is actually a gift from a contractor. That phone is expensive and exceeds the limits in Huntsman's Anti-Corruption Policy. What should I do?

**A:** This is an unacceptable gift because it could influence your manager or give the appearance of affecting his objective business judgment. You should report your concerns promptly to your Facility Compliance Officer or any member of the Ethics and Compliance Team. You may also use the Speak Up hotline.

**Q:** A vendor offered me an all-expenses-paid trip to attend a trade show. I think attending would really help me in my work. Can I accept the offer?

**A:** You must obtain approval from your manager and Facility Compliance Officer before accepting payment of travel expenses. Travel may be approved only if it furthers Huntsman business and is not offered for improper purposes. Also remember that attendance at trade associations/trade shows may require additional approvals and training.

**Q:** I've worked in sales at Huntsman for the past five years. I'm in the U.S., but I just took over a big account with a government agency in Asia. On a phone call with one of the agency's employees, I was told that certain donations were a normal part of doing business in their country. I didn't agree to anything and said I'd get back to him. What should I do?

**A:** Report the incident to the Ethics and Compliance Team as soon as possible. These payments could appear to be facilitation payments or bribes, and we avoid even the appearance of corruption wherever we do business.

Remember that employees of government-owned or controlled companies are considered government officials. All donations, including charitable donations, must be approved in line with our Delegations of Authority. For donations to or from a government contractor or official, you also need prior written consent from the Ethics and Compliance Team.



# Complying with International Trade Laws

As a global company, we respect all international and national laws in the locations where we do business. Our ability to maintain and grow our business depends on it. International trade laws are complex and vary from location to location. We are responsible for knowing and following these laws wherever we do business. By doing so, we protect Huntsman from penalties and make the world a safer place to do business.

## Our Formula for Success

We comply with international trade laws when we:

- Never recruit, market, or distribute across international borders without first knowing the regulations.
- Never do business with companies or individuals on sanctions lists.
- Assess risk and conduct due diligence for all third parties with whom we plan to do business.
- Contact the International Trade Compliance Group with any concerns, or if any customers or business partners ask us to participate in a boycott.
- Comply with all restrictions regarding access to customer information.

## Learn More

- [International Trade Compliance Policy](#)
- [International Trade Compliance Policy iGuide](#)



## Imports and Exports

An **export** is a product or service that is shipped to a person in another country. An export can be technology, technical information, or software provided to a non-citizen, regardless of where in the world that individual is located. Before exporting anything, we must be sure that both the delivery country and the recipient are eligible. We must also obtain all required licenses and permits, and pay all relevant duties or tariffs.

We **import** when we bring the goods we purchase from a foreign or external source into another country. Imports are also subject to various laws and regulations. We may need to pay duties or tariffs on the imported goods that enter the country as well as submit certain filings.

We must observe all trade laws related to technology transfers. Some countries, such as the U.S., control the release of technical information to noncitizens within their country. Such information can include email, training, and web access. Transfer of such information could be considered a **deemed export** and can occur without anything crossing any borders. When in doubt about whether a trade restriction applies, seek guidance from the International Trade Compliance Group.

## Boycotts

A **boycott** is when one person, group, or country refuses to do business with certain other people or countries. Some countries attempt to impose boycott requirements on companies operating within their borders. We must be alert to boycott requests and raise all such requests to the International Trade Compliance Group.

## Formulating Answers

**Q:** I'm a procurement specialist at Huntsman in New Jersey. I'm leaving tomorrow on a last-minute trip to India. I need to take my laptop, but it contains a large amount of Huntsman program designs. I know I should have obtained an export license, but time was short. Can I leave the country without the license as long as I apply for it before I leave?

**A:** No. You need all necessary permits before leaving the country with technology that qualifies as an export. Export trade controls can apply to products, software, and technology, including those that a Huntsman associate may carry while traveling abroad. If you are unsure whether you need an export license, seek guidance from the International Trade Compliance Group.



# Preventing Insider Trading

We are responsible for handling material, non-public information about Huntsman and our business partners, actual or prospective, appropriately and with integrity. In the course of our work, we may gain non-public information about Huntsman or one or more business partners. We may never use or give to a third party such information to make personal investment decisions to buy, sell, or trade in securities (such as stocks, bonds, and options). This is considered insider trading and can harm more than our reputation. It can lead to criminal penalties, including in some cases imprisonment for individuals, and severe consequences for Huntsman.

## Our Formula for Success

We prevent insider trading when we:

- Never buy or sell shares in Huntsman or any other publicly traded company when we possess material, non-public inside information.
- Never share material, non-public inside information with anyone outside Huntsman, including family and close friends.
- Only share inside information with associates who need to know.
- Never pass on inside information to someone who will likely act on it (known as “tipping”).
- Never spread false information to affect the price of publicly listed securities.
- Direct any inquiries about inside information to Investor Relations.
- Contact the Legal Department if we are unsure about whether information is material or non-public.

## Learn More

- [Insider Trading Policy](#)
- [Insider Trading Policy iGuide](#)

## Inside Information

Company information is **material** if a reasonable investor would use it to help decide whether to buy, hold, or sell the stock of that company. Information is considered **non-public** until one full trading day has passed since the public release of the information. Inside information can be either positive or negative.

Examples of inside information include:

- Projections of future earnings or losses
- News of a merger or acquisition
- News of a significant sale of assets
- Financing and other events regarding Huntsman's securities
- Changes in executive management
- Significant new products or discoveries

## Formulating Answers

**Q:** I am a manager at a Huntsman manufacturing plant. My son is starting college soon, and I want to sell my Huntsman stock to help pay tuition. At work, I learned that Huntsman is negotiating confidentially to acquire a large company. Can I still sell my Huntsman stock?

**A:** No. Assuming that the news of the acquisition is material, you must wait the appropriate time after the deal is made public before you can sell your stock. If you trade the stock while in possession of material, non-public information, you may be liable for insider trading, which can result in criminal penalties.



# Maintaining Accurate Business Records

We are honest in all our communications, and that includes every record we create and all data we enter into our systems. Maintaining the integrity of our records ensures we follow the law as we plan for the future. Keeping accurate records also provides assurance to our shareholders, business partners, and customers.

## Our Formula for Success

We maintain business records ethically when we:

- Ensure that every record is correct and complete, including time and expense records.
- Report all financial transactions accurately, in a timely manner, and with the necessary documentation.
- Never mischaracterize our business operations or finances.
- Never create undisclosed or unrecorded accounts.
- Promptly submit records to auditors as required or requested.
- Preserve any record subject to a legal hold for an investigation or audit.
- Follow Huntsman's system of internal controls and our record-keeping requirements.

## Learn More

- [Document Retention Policy](#)
- [Document Retention Policy iGuide](#)
- [Document Management Program intranet site](#)

## Document Management and Records Retention

Our Record Retention Schedule and Document Management Program dictate how long we retain records, including duration and when they can be destroyed. Though periodic file maintenance and discarding of convenience copies is appropriate, we do not destroy records before the time specified in the records retention schedule.



## Formulating Answers

**Q:** My department has a number of records that need to be sorted. My supervisor has asked me to organize these records and find out which ones can be destroyed. How do I go about this?

**A:** First, determine whether any documents are subject to records retention requirements or a legal hold, because those records must be kept for the length of time specified in the Record Retention Schedule or until the legal hold is lifted. Even if a legal hold on a record is lifted, the Record Retention Schedule still applies consistent with our policies so that records may need to be held longer. Records that are not subject to any restrictions can and should be destroyed consistent with our policies. If they contain confidential information, they must be shredded. Your department should have secure collection containers clearly marked for shredding. To learn more, visit the Document Management Program intranet site.



# We Show Respect to Everyone

Respect is the foundation of all our interactions at Huntsman. Through respect, we facilitate a sense of mutual understanding, protect private information, and uphold our commitments to the environment, our communities, and human rights.

## Fostering a Respectful Workplace

We treat everyone with respect. Part of our formula for success is ensuring that all our associates feel valued and respected. We are committed to diversity and inclusion, equal employment opportunity, and a workplace free from harassment and discrimination. These commitments foster a professional and supportive work environment for all.

## Embracing Diversity and Inclusion

We do business around the world, and we are committed to reflecting a global diverse perspective in our workplaces. Diverse talents and points of view enhance our teams and broaden our vision. When we include everyone, we make better decisions— together.

## Our Formula for Success

We embrace diversity and inclusion when we:

- Treat all people and their points of view with courtesy and respect.
- Hire and build diverse teams.
- Actively seek out different perspectives and approaches to find solutions.





## Prohibiting Discrimination

We create a work environment free from unlawful discrimination. We hire and promote on the merits because doing so supports our formula for success. Discrimination not only is against the law but also limits the talent and ability we bring to Huntsman. Being our best as a company also means standing by our values of respect and integrity.

## Our Formula for Success

We ensure our workplaces are free of discrimination when we:

- Make all hiring and promotion decisions based on merit.
- Treat everyone fairly, focusing on the value each of us brings to Huntsman.
- Never discriminate based on protected characteristics.
- Ensure our workplaces accommodate people with disabilities.

## Protected Characteristics

Huntsman is committed to creating a work environment free of discrimination. We believe in opportunity for all, and we do not tolerate discrimination against an associate or applicant based on protected characteristics. Protected characteristics can be any of the following:

- Race, color, or ethnicity
- Religion
- Gender or sexual orientation
- Age
- Disability
- National origin

This list is by no means exhaustive. We respect laws protecting groups and activities in all countries where we do business.

## Formulating Answers

**Q:** My new manager recently announced that he would be moving weekly team meetings from 3 pm on Wednesdays to noon each Friday. I worship every day during the noon hour, and it has never been an issue in the past. I told my manager, and he said that it is an issue now, and if I cannot attend the meetings because of my “ridiculous religious beliefs,” I may not receive a positive merit review. I was offended and shocked. What should I do?

**A:** Your manager's comments are offensive to you and incompatible with Huntsman's values. Your new manager may have a business reason to move the meeting to noon on Fridays but needs to treat you with respect when discussing your concerns and any potential alternatives. Promptly report your manager's comments to your local Facility Compliance Officer. You may also talk to your Human Resources Manager. Remember that you can always use the Speak Up hotline or contact the Ethics and Compliance team at [ethics@huntsman.com](mailto:ethics@huntsman.com).





## Preventing Harassment

Huntsman is committed to a work environment where all associates are treated with respect and dignity. We require our workplace to be businesslike, professional, and free of harassment. Such an environment ensures that associates are able to do their best work.

## Our Formula for Success

We create a work environment free of harassment when we:

- Avoid saying or doing anything that may be perceived as offensive.
- Treat everyone with dignity and respect.
- Speak up if we witness harassing or offensive conduct.
- Respect personal boundaries and preferences.

## Learn More

- Policy Against Discrimination, Harassment, and Retaliation
- Policy Against Discrimination, Harassment, and Retaliation iGuide

## Formulating Answers

**Q:** A fellow associate in my department repeatedly refuses to provide me with information that is essential to my job. He calls me derogatory names and tells other associates that I am not qualified to do my job. His actions are hurtful, but I don't want to anger him or create any more trouble for myself. How should I handle the situation?

**A:** Harassment and intimidation can take many forms. Name calling is unacceptable. While refusing to provide information or telling others someone isn't qualified may not be illegal, it can be viewed as disrespectful and undermines trust. Remember that you will not face retaliation for making a good-faith report. You should immediately discuss his behavior with your manager. You may also use the Speak Up hotline or contact the Ethics and Compliance team.



# Keeping Our Workplace Safe and Secure

Safety in the workplace is essential to our success. We cannot enrich our customers' lives if we are not protecting our own. As a company that innovates with complex products and processes, Huntsman must maintain safe and secure workplaces. We are all responsible for our safety and security at work.

## Our Formula for Success

We keep our workplace safe and secure when we:

- Never take unnecessary risks on the job.
- Never report to work under the influence of drugs or alcohol, and report anyone who does.
- Report any unsafe or unhealthy working conditions.
- Know all emergency procedures and take part in emergency drills and trainings.
- Report any threats of violence we witness, including on social media.
- Never bring weapons of any kind to work.
- Keep all Huntsman property secure using locks and passwords when not in use.
- Call law enforcement if danger is imminent.
- Follow all policies and procedures related to health and safety.

## Learn More

- [Environmental, Health and Safety Policy](#)
- [Environmental, Health and Safety Policy iGuide](#)



## Incidents and Near Misses

Incidents and near misses are a serious business matter, and we all have a responsibility and an obligation to report them—whether we were involved in the event or just witnessed it. Identifying and understanding these incidents allows us to prevent them from happening again, and that reduces risk for us all. Reporting incidents and near misses is in line with both our values and the law.

## Alcohol and Drug Use

We never report to work under the influence of drugs, alcohol, or any other substance that may impair our ability to work safely. The possession, use, sale, purchase, or distribution of any illegal drugs, paraphernalia, or controlled substances by any associate is prohibited.

Keep in mind that even prescribed medication can impair our ability to perform or work safely. Be aware of any medication that may hinder your work, and make sure a manager or HR knows about it. We must look out for the safety of all persons on our premises at all times.

# Protecting Private Information

We protect associates' and business contacts' personal information. Our associates and business contacts around the world regularly entrust us with their private information. To maintain those relationships and our reputation, we must protect that trust.

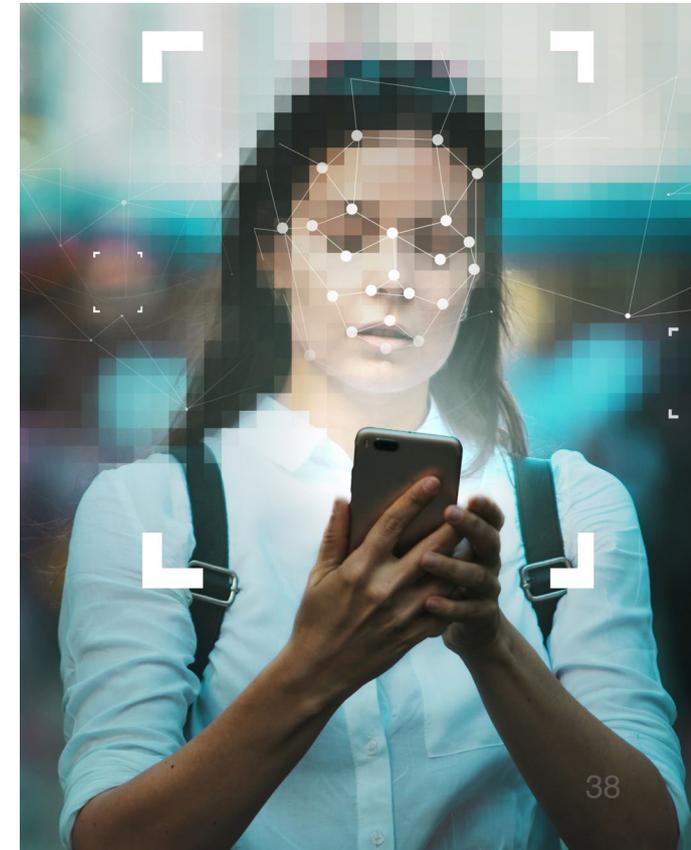
## Our Formula for Success

We protect private information when we:

- Limit use of private information to our job duties.
- Follow all procedures to keep information secure.
- Retain private information only as long as required.
- Never share private information outside Huntsman.
- Immediately report any suspected data breach.
- Comply with all privacy laws, wherever we do business.

## Learn More

- [Privacy Policy](#)
- [Privacy Policy iGuide](#)



## Huntsman's Categories of Private Information

We sometimes need to collect private information for business purposes. Huntsman identifies four categories of personal data:

- Name and business contact information (e.g., work telephone number and business address) (Category 1)
- Huntsman-created personal data (e.g., compensation and benefits) (Category 2)
- Personal data provided by the individual (e.g., voice, image, and contact information) (Category 3)
- Sensitive personal data (e.g., ethnicity, religious beliefs, and personal banking information) (Category 4)

Huntsman requires all associates to take a Data Privacy training course. Some associates have access to Category 3 or 4 data based on their position. These associates are assigned additional training.

## Personal Data Breach

A personal data breach is the unauthorized acquisition of personal data that compromises that data's security. Each personal data breach will vary in impact and risk depending on many factors, including the jurisdiction of the affected individuals. These can be internal (within Huntsman) and external (outside Huntsman) breaches. Both kinds need to be reported so Huntsman can appropriately investigate, log, and report as required.

Any associate who discovers or is notified about a potential or known internal or external breach of personal data should immediately report it to the Local Security Officer, Local HR, Facility Compliance Officer, or Data Privacy Team.

## Formulating Answers

**Q:** My manager accidentally left a copy of an associate's performance review file on the photocopier. This personal information is not secure. What should I do?

**A:** We have a responsibility to protect the privacy of our fellow associates. Confidential personal information about associates should not be shared or left unsecured in or outside of the office. You should immediately return the file to your manager. If this happens again, speak with your Human Resources Manager about the issue.



# Environmental, Health, Safety and Sustainability Commitments

We apply science to create, manufacture, and sell products that enrich lives and help create a sustainable future, while doing no harm to people or the environment. We place care for human health, safety, and the environment at the forefront of all we do. We can prevent harm through excellence in environmental, health, and safety (EHS) performance in all aspects of our business. This makes us not only competitive in the present but also sustainable into the future. The health of our business, our associates, and our communities are intertwined.

## Our Formula for Success

We achieve excellence in environmental, health, safety and sustainability performance when we:

- Communicate hazards related to our processes and products.
- Communicate to business partners and customers how best to use, store, recycle, and dispose of our products.
- Assess hazards and follow all protocols related to the transportation of dangerous goods.
- Register all substances and products.
- Act as stewards for our products to minimize the EHS risks throughout their lifecycles.
- Report concerns or breaches in protocol to our EHS manager.
- Follow all EHS and sustainability laws that govern our business.
- Comply with all environmental programs to meet Huntsman goals and regulations.

## Learn More

- [Environmental, Health and Safety Policy](#)
- [Environmental, Health and Safety Policy iGuide](#)

# Contributing to Our Communities

We seek to make a positive difference in the lives of others around the world. Our business has grown through our belief that chemistry can meet the pressing needs of our day and, as individuals, we can also help address the challenges of our time in the communities where we live. Helping our communities through personal involvement is not just good for our reputation—it's the right thing to do.

## Our Formula for Success

We best contribute to our communities when we:

- Volunteer for charitable organizations around the world where we can.
- Ensure outside activities do not interfere with our job duties or create a conflict of interest.
- Never pressure associates to volunteer for or contribute to organizations we are passionate about.
- Obtain approval before donating on behalf of Huntsman or using Huntsman funds for charitable purposes.

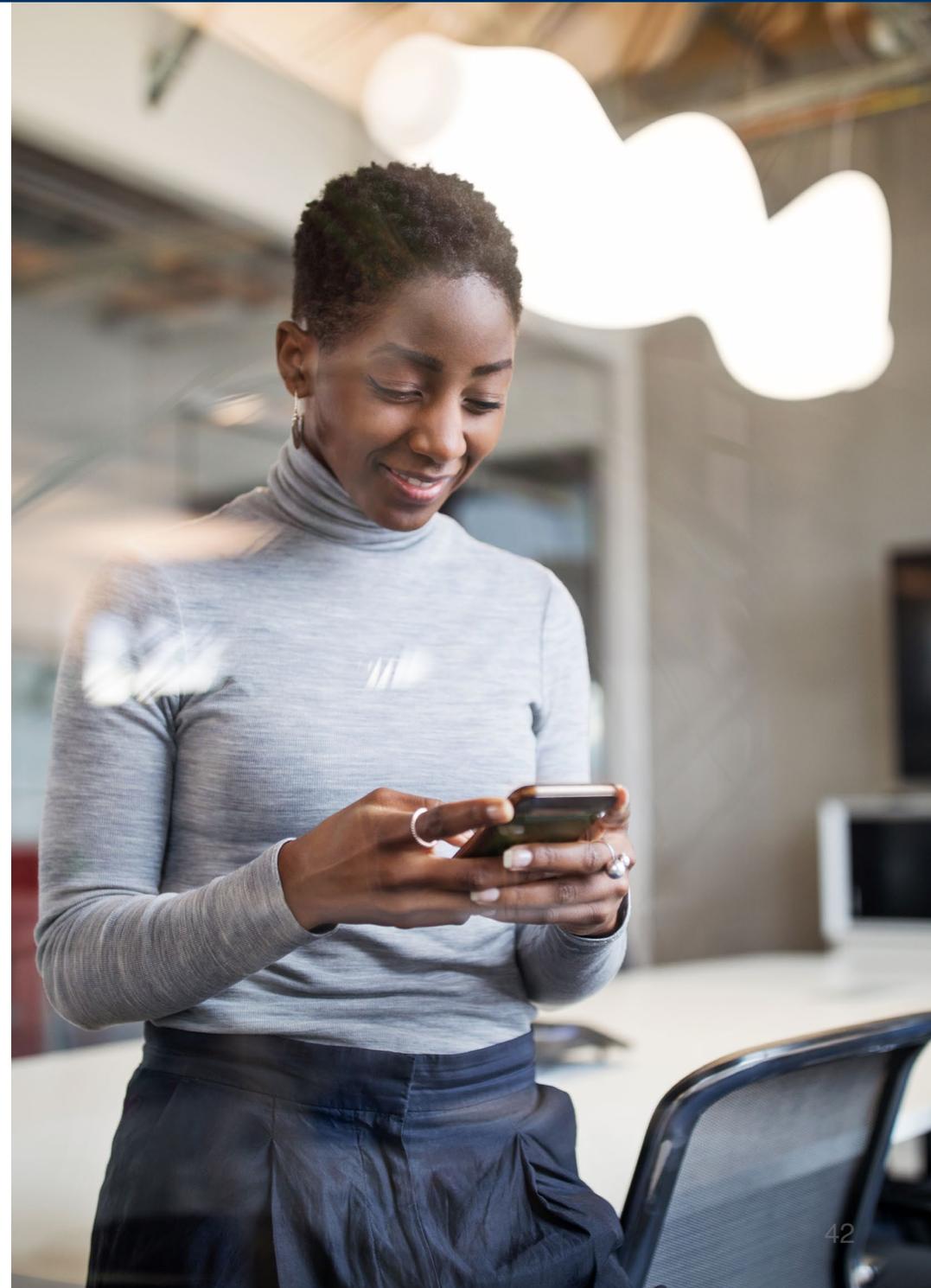
## Learn More

- Anti-Corruption Policy
- Anti-Corruption Policy iGuide



## Political Activities

Each of us is free to have our own political beliefs as citizens. We may be personally involved in politics and make political contributions within legal limits. Because political contributions are subject to complex rules and regulations, we are to avoid any personal involvement that might suggest approval or endorsement by Huntsman. The law restricts the use of a corporation's resources and facilities in connection with political campaigns, except for limited circumstances. Any use of Huntsman's resources or facilities, or any activities during working hours on behalf of any campaign, requires prior approval by the Legal Department.



# Respecting Human Rights

We respect the human rights of individuals and communities around the world. We work to ensure those rights wherever we do business, and we expect the same of our business partners. Slavery, human trafficking, and child labor have no place in our business or in global society. We support the dignity and equality of all human beings, and we are responsible for upholding the rights of all.

## Our Formula for Success

We respect human rights when we:

- Provide reasonable working hours and fair wages for all who work on our behalf.
- Ensure all our business partners are committed to fair labor practices.
- Never use child or prison labor anywhere in the world.
- Report violations of human rights if we become aware of them.

## Learn More

- Human Rights Policy
- Human Rights Policy iGuide
- Vendor Code of Conduct



# We Are Responsible with Company Assets

We must protect all of Huntsman's business assets, both tangible and intangible. Our assets include our physical and intellectual property, confidential information, information technology, and social media accounts.



# Responsible Use of Physical Property

As a global company that has operated around the world for decades, Huntsman has amassed a number of physical assets. Our physical assets include our workplaces, tools and equipment, vehicles, computers, office supplies, funds, and more. These assets are not only *of* value to us—they are *what* we use to *create* value for our partners and customers. We are all responsible for these assets. We must protect them and use them with integrity. We never put our physical property at risk of loss, waste, or otherwise wrongful use.

## Our Formula for Success

We use our physical property responsibly when we:

- Use our physical assets for business purposes only.
- Secure workplaces, vehicles, and technology using appropriate locks and passwords when not in use.
- Never allow unauthorized personnel to visit or use our physical property.
- Report damage to physical property due to accidents and wear and tear.
- Follow all procedures and protocols when using our physical property.

## Learn More

- Business Travel and Expense Policy
- Computer, Email, and Internet Usage Policy
- Computer, Email, and Internet Usage Policy iGuide



## Misappropriation

**Misappropriation** is dishonest, unfair, or improper taking of something that belongs to another for one's own use. We never misappropriate Huntsman's physical property or allow anyone else to do so. Speak up if you become aware of any misappropriation in your workplace.

## Formulating Answers

**Q:** I travel frequently as part of Huntsman's sales team. I want to take my wife on a business trip in Miami. She can take time off from her job, and we can enjoy the evenings together. Can I use my Huntsman corporate travel and expense card for both of us? I can pay the credit card company out of my own pocket for her half of the expenses.

**A:** No. A Huntsman travel and expense card is an asset intended for business purposes only. You or your wife will have to pay separately for all her expenses. Document your business expenses carefully and keep them separate from all personal expenses.



# Protecting Confidential Information and Intellectual Property

Like the Company's physical assets, our confidential and proprietary information and our intellectual property (IP) help us create value for our partners and customers. This information also defines what is unique about Huntsman. It distinguishes us from our competitors and gives us a competitive advantage. Our hard work in pursuit of innovation has yielded this strategic knowledge. We must all protect our proprietary information to ensure our value to customers well into the future.

## Our Formula for Success

We protect our confidential information and intellectual property when we:

- Engage with the Legal Department and our divisional intellectual property managers when we develop IP.
- Never misuse or alter the Huntsman name, logos, or trademarks.
- Report any misappropriation or misuse of company data or IP to the Legal Department.
- Share IP only with authorized associates who need to know.
- Never discuss confidential information in public places, such as elevators, cafes, and airports.
- Never make confidential information visible in public—for example, on a laptop or tablet.
- Keep all confidential information secure with appropriate protections, such as encryption and passwords.

## Learn More

- Contact the Legal Department's intellectual property team



## Understanding Confidential Information

Confidential information can come in many forms. Examples include the following:

- Information used to create and ultimately file for patents, trademarks, and copyrights
- Trade secrets
- Process and product information
- Manufacturing plans and capabilities
- Research and development plans and information
- Customer lists
- Business plans and results
- Bid information
- Unpublished pricing information
- New product plans
- Internal reports, policies, and procedures

## Third-Party Intellectual Property

We always respect IP rights of others when carrying out Huntsman's business. Unauthorized use or misappropriation of another party's IP may expose individual associates and Huntsman to significant civil and criminal penalties.

We should not copy a third party's copyrighted materials (or make other works based on them) for use on behalf of Huntsman unless we have received permission. Material available through the Internet or without a copyright notice is not necessarily free for us to use.

Contact a Huntsman IP lawyer immediately if:

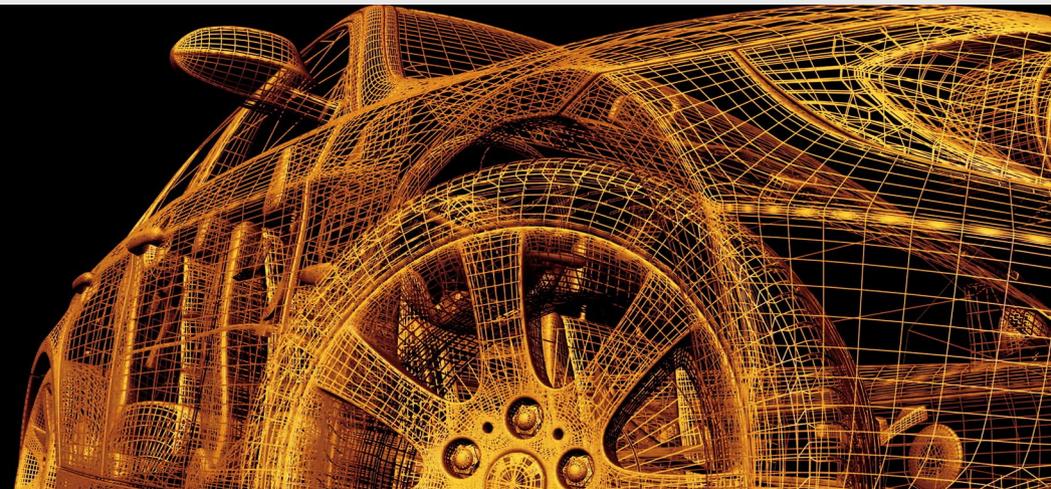
- A question arises regarding a third party's IP rights.
- A third party claims that a violation of its IP rights has occurred.

We never respond to any such claim without the approval of a Huntsman IP lawyer.

## Formulating Answers

**Q:** One of my new hires is from a competitor of Huntsman's. We're lucky to have her. I think she could provide us with some really useful information about our competitor's customer lists. Can I ask her for this information, as long as it's for business purposes and I don't tell anyone outside our team?

**A:** No. We never solicit non-public or confidential information about a competitor. All our new hires should learn Huntsman's values, and we are all responsible for ensuring those values are respected. We must lead with integrity. Soliciting or revealing confidential information from a former employer goes against our values and may be illegal. We never put ourselves or others in a position that could lead to unlawful conduct.



# Safeguarding Information Technology

We are responsible for using our network and computer systems ethically and legally. We never use Huntsman systems in violation of the law. Our information technology (IT) systems allow us to communicate and coordinate in pursuit of our business goals. To promote honesty in all our communications, we must protect our IT systems. Our communications infrastructure carries and houses sensitive business information. At times, Huntsman may need to monitor devices and IT systems for security reasons.

## Our Formula for Success

We safeguard our information technology when we:

- Compose all electronic messages (emails, text messages, posts, etc.) with the same care we apply to the creation of all Huntsman documents.
- Understand that electronic messages are stored and recoverable, and must be free of offensive or hostile content.
- Keep all computer and IT equipment safe and secure at all times.
- Ensure that all software used on our assets is approved by Asset Management.
- Never misuse, copy, or steal Huntsman's software or other IT infrastructure.
- Ensure that only authorized personnel have access to computer and IT systems.
- Protect our user IDs and passwords and change them regularly.
- Never open suspicious links in emails or on the Web.
- Report any breaches in IT security immediately to your manager and the Legal Department.

## Learn More

- Computer, Email, and Internet Usage Policy
- Computer, Email, and Internet Usage Policy iGuide



# Using Social Media and Handling Public Inquiries

We ensure that use of social media reflects our values and preserves Huntsman's integrity and reputation. Social media continues to change the way we work, communicate, and interact internally with our colleagues and externally with our customers, vendors, and communities.

While social media creates new opportunities for interaction, it also creates new responsibilities and risks.

One risk of social media use is presenting Huntsman in a way that is inconsistent with our values and goals. We must speak to the public with one voice. Communication on behalf of Huntsman should be handled by our spokespersons. Public inquiries must always be directed to designated associates. When we follow this process, we make the best use of all channels of communication.

## Our Formula for Success

We use social media best when we:

- Ensure that our conduct on social media matches our conduct at work.
- Use our best judgment and common sense about what to share.
- Never make discriminatory, offensive, or hostile remarks online.
- Ensure that social media posts about Huntsman preserve or enhance our reputation.
- Never speak on behalf of Huntsman on social media.
- Never share confidential and non-public information.
- Send all public inquiries to Global Communications at [Social\\_Media@Huntsman.com](mailto:Social_Media@Huntsman.com).

## Learn More

- Social Media Policy
- Social Media Policy iGuide



## Personal Social Media Use

You may at times want to use your personal social media to post about Huntsman. Keep these Do's and Don'ts in mind:

### Do

- Make it clear you are a Huntsman associate but your views are your own.
- Be careful with personal social media at work.
- If you are a manager, you need to be particularly careful as your position may lead people to believe or infer that you are speaking on behalf of Huntsman.

### Don't

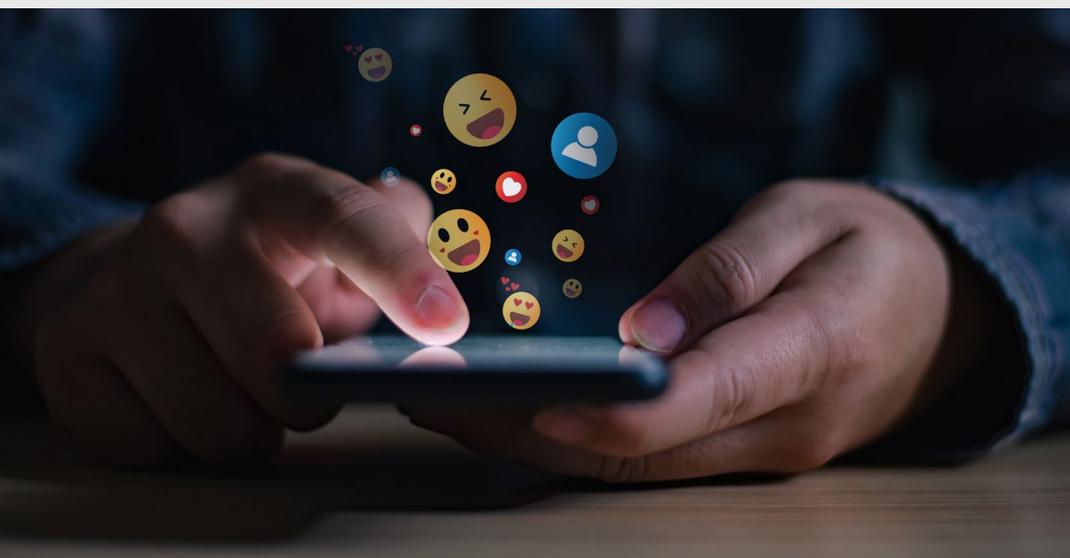
- Respond to negativity.
- Use a Huntsman email address.

## Understanding Public Inquiries

A misquote or a comment taken out of context could result in severe consequences. Even informal requests for official Huntsman information from a member of any of the following groups is of concern:

- Investors
- Securities analysts
- Rating agencies
- Members of the press
- Holders of Huntsman stock or debt securities
- Any other key public contacts

Ensure that any such inquiries are directed to the Global Communications Team.



# Conclusion: Our People Make *the Difference*



## Summary

At Huntsman, our core values—honesty, integrity, respect, and responsibility—define our formula for success. When it comes to applying those values, our people make the difference. Consult these Guidelines, or one of the many resources listed below, if you are unsure about an ethics-related business situation. Use the Guidelines to refresh your memory on an important issue or aspect of your role. Your choices at Huntsman are as valuable as your professional contributions. Let these Guidelines guide you in applying our values through challenges and triumphs alike.

## Resources

- Your line manager
- Your local Human Resources Representative
- Your Facility Compliance Officer: <https://ethicsandcompliance.huntsman.com/en/contacts/facility-compliance-officers>
- Any Compliance Champion: <https://ethicsandcompliance.huntsman.com/en/contacts/compliance-champions>
- Ethics and Compliance Team: <https://ethicsandcompliance.huntsman.com/en/contacts/ethics-and-compliance-team> and [ethics@huntsman.com](mailto:ethics@huntsman.com)
- Chief Compliance Officer
- Legal Department
- General Counsel
- Speak Up hotline: [www.huntsman.com/speakup](http://www.huntsman.com/speakup) (refer to the Ethics and Compliance intranet site for country-specific phone numbers)

## Waivers

Our Business Conduct Guidelines apply equally to all associates, officers, and directors of Huntsman. As such, waivers of our Guidelines are made rarely and only in very limited circumstances. Waivers for executive officers or directors must be approved in advance by the Board of Directors. Under certain circumstances, waivers must be promptly disclosed to shareholders. We report waivers that have been granted as required by applicable laws and regulations.



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# HUNTSMAN

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Enriching lives through innovation

