



CODE OF CONDUCT

VISION MISSION & VALUES



Message from Group Managing Director

I am happy to release the 2nd edition of our Code of Conduct Manual.

We deliver extraordinary products and services to our customers through world class manufacturing activities, and provide great value to our stakeholders. These achievements are rooted in our business philosophy of creating real value for customers and treating our colleagues and employees with respect. In order to ensure our future success, we must continuously remain committed to our core values.

The purpose of this manual is to help all of us to conduct our work according to the principles that we stand for. It further defines appropriate conduct in many situations and provides additional tools when the answer is not clear.

Adherence to this Code is not optional. We cannot achieve long-term success by compromising our values and standards for short-term convenience. Each employee is expected to read this Code and understand how it applies to his or her job.

Leadership should address employees questions and concerns about compliance promptly and respectfully. Retaliation for raising these concerns will be treated seriously.

Best Wishes

Amit Lohia
Group Managing Director

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I. General Information

WHY WE HAVE A CODE OF CONDUCT?

Indorama is a large global conglomerate comprising of multiple nationalities and diverse cultures. All our employees are expected to conduct themselves in line with global standards, international and local laws and regulations, and our core values. The purpose of the Code of Conduct is to facilitate that.

This Code of Conduct encourages specific forms of behavior by employees and provides guidance about values and choices to influence correct decision making. Further, it describes how we apply these values into practice every day. It explains our commitment and expectations towards stakeholders and provides guidance for employees and everyone who work with us.

From time to time, the Company may revise the Code of Conduct and appropriately communicate them to employees.

WHAT IS EXPECTED OF US?

You are expected to:

- Demonstrate commitment to the Company's core values in all your work activities, and help to make the Company a great place to work so that all of us can achieve the best for our customers and other stakeholders.
- Follow the laws and regulations of the land.
- Adhere to the Company's policies and work procedures.
- Seek guidance when unsure of proper action in any situation.
- Raise concerns about suspected violations of this code or other Company policies.

If you manage other employees, you are expected to:

- Ensure that employees are aware of this Code of Conduct and their responsibilities.
- Assist employees with any questions or concerns regarding the Code of Conduct or its application in daily work.
- Personally demonstrate compliance by following the Code of Conduct and talking to employees about the Code's application in their daily work.

If you have a question about the Code or how it applies to your job:

- Consult your manager, who is in the best position to help you in addressing. If your manager is not available, contact his/her superior or HR department.
- If you manage other employees and are unsure how to answer a question your employee has raised, you also should contact your superior or HR department.

NON-COMPLIANCE

If you believe that the code is not being followed:

- First, talk to your manager about this issue.
- Then contact HR department and inform them of the situation.

Report potential retaliation

- The Company will not tolerate and will address retaliation against anyone who in true sincerity reports a non-compliance issue. Retaliation can take many forms, from unfair impact on one's employment to general harassment. If you believe that you or someone else is retaliating, immediately report the matter to HR department.

There is no good excuse for compliance violations

- Be aware of the following excuses:
 - “My boss told me to do it even though I knew it was wrong.”
 - “I did it for the good of our employees or customers.”
 - “I did it to meet company objectives or goals.”

II. Purpose, Principles and values

Why We Exist?

Purpose

Our purpose is to build, acquire, and operate world-class manufacturing businesses; anywhere in the world, based on internal synergies and growth opportunities

Sought for “Business Leadership”

How We Do It?

Principles

Industry Excellence • Customer Delight • People First • Sustainability

Values

Execution • Leadership • Environment • Commitment

Teamwork • Respect • Innovation • Courage

Knowledge • Openness • Motivation • Governance

III. Human Resource Policy

HR PROCESSES

Our HR processes are based on the principle of People First. We firmly believe that our employees are our most important and valuable assets. We believe all our employees are part of the **Indorama Family**. And as part of this family, all members are to be treated with respect, understanding, and compassion. We feel it is our responsibility to look after the welfare and wellbeing of our employees. We are also cognizant of the fact that this relationship has to be two-way, wherein employees are also committed and devoted to the welfare and wellbeing of the organization.

For world-class HR functionality, we believe our human touch must be accompanied with world-class practices. Over many years, our HR function has developed many systems, practices, and tools to provide uniformity, transparency, growth, and personal development for our employees across various business units. This process is never ending and we are constantly striving to improve further.



Simply put, our HR objective is to have **High Performance, Morale, and Talent Retention**. Our 7 drivers for that are (a) Performance Management, (b) Compliance, (c) Personal Development, (d) Talent Development, (e) Recognition, (f) Recruitment, and (g) Continuous Improvement. All of our efforts and initiatives are geared towards improving upon these 7 drivers continuously.

IV. Code of Conduct

INTRODUCTION

This Code of Conduct (the “Code”) is applicable to all employees, board of commissioners & board of directors of Indorama Corporation.

All employees must demonstrate their commitment to the Code by setting the right example, maintaining a workplace environment that adheres to the Code, and acting affirmatively to prevent violations of the Code.

Article 1 GUIDING PRINCIPLES

This document introduces you to specific principles and policies covering key ethical issues. It will identify risk areas that you may encounter in your job and provide guidelines on how you should conduct yourself. In the event of any doubt, you should take suitable guidance from your superiors.

Article 2 SUPERVISION

Supervision of conduct is as important as supervision of performance. Managers are expected to lead by example and support their team members to be ethical in all dealings and to avoid even the appearance of unethical conduct. Open communication should be encouraged in the department to ask questions concerning ethical matters. Self-reporting of ethical violations should be encouraged and voluntary self-reporting will be taken positively when determining disciplinary action. Also recognize and appreciate employees who raise ethical issues.

Article 3 DISCIPLINARY ACTIONS FOR VIOLATIONS

Appropriate disciplinary action, including termination, may be taken against anyone who violates the Code. Self-reporting of ethics violations is encouraged and will be considered positively when determining the appropriate disciplinary action.

Article 4 HOW TO RAISE A CONCERN

You may report concerns or possible violations of these guidelines (or other Indorama policies) by any of the following methods:

Open Door. The Open Door is the most direct way to voice any concern to a superior. If you believe your supervisor(s) is involved in misconduct, then report the misconduct to the next level of management believed not to be involved or use one of the other channels described below:

- Senior member of the Corporate / unit HR
- Senior Management member / Director
- Under extreme circumstances, contact the MD / GMD

It is the responsibility of the receiving member to promptly escalate the matter to his/her superiors and if

necessary to the level of the Business Head / Directors / MD. In case of doubt, it is always better to escalate the matter higher than lower.

Article 5 HONESTY

Employees must not take or receive any benefit in cash or kind from any supplier, customer, agent, service provider, business partner, or affiliate. Should an employee be offered cash or other benefits from a third party, the matter must be immediately reported to the superior. If an employee has received anything in the form of gift / cash from a third party, they should hand over the same to their superior. If any employee is a witness to another employee receiving any form of corruption or bribery, the matter must be reported promptly.

Article 6 CONFLICT OF INTEREST AND MISUSE OF AUTHORITY

Situations and relationships must be avoided that involve actual or possible conflict of interest. The appearance of a conflict may be just as damaging as the actual conflict. A conflicting situation arises if you take actions or have interests that are inconsistent with the interests of Indorama or that may interfere with your ability to perform your job impartially and to the best of your ability on behalf of the Company.

You are responsible for advancing Indorama's business interests when the opportunity to do so arises. You may not take any opportunity or use any confidential information for your personal benefit, or for the benefit of your friends or family members, that you discover or obtain while working with Indorama.

You may also not use your position in Indorama or any of Indorama's resources, property or information for you, your friends, or family members personal gain or benefit.

Guidelines:

- It is your responsibility to disclose to your immediate supervisor any situation that you believe creates or could create a conflict of interest.
- When in doubt, disclose the facts and get advice before acting.

Article 7 GIFTS AND GRATITUDES

You may not request, encourage, or accept a gift or gratitude from an existing or potential supplier, service provider, customer, or any other business partner.

Corporate compliments of nominal value that are given on special occasions (such as New Year) or corporate gifts (such as annual diaries, pens, calendars, and other such nominal value goods which are under value of \$100) are exempt. In case you have a doubt if an item does or does not qualify under this category, consult your supervisor.

Examples of disallowed gifts or gratitude's:

- Free merchandise
- Tickets to sporting or entertainment events
- Money
- Paid trips

- Personal services or favors

Guidelines:

- Any gift or gratitude received must be reported to your immediate supervisor and then must be returned on the pretext of company policy.
- Where return is impractical, any gift that is not returned should be reported to your supervisor and should be deposited with the Commercial department for re-use or for other purposes.
- Any offer of a gift or gratitude must be reported to your supervisor also.
- Avoid providing your residential address to any supplier for sending any gifts (including corporate complimentary gifts). If any is still received, it must be reported to your supervisor and deposited with the commercial department for re-use or for other purposes.

Article 8 CONFIDENTIAL INFORMATION

All employees should be fully aware of and strictly keep confidential the company's information and documents and shall not divulge or disclose to any unrelated persons. Confidential information includes but is not limited to trade secrets, know-how, methods or processes, non-public company information, customer information, supplier information, or information about other organizations with whom we have association or do business with. We aim to maintain the highest level of confidentiality for information belonging to our customers, channel partners, suppliers and other business partners.

You must return all confidential information along with any other Indorama property in your possession upon end of employment.

Guidelines:

- Do not disclose confidential information to anyone outside the company without the express approval of your supervisor. Before the exchange of material information, a 'Confidentiality Agreement' must be signed with the other party (available with the Commercial or Finance Department).
- Disclose confidential information only for legitimate business purposes.
- Handle all confidential information with care to avoid inadvertent or careless disclosure.
- Secure or password-protect all files or records containing confidential information as necessary to protect the confidentiality of that information.

ARTICLE 9 TRADE SECRETS

Indorama has invested greatly in the development of its systems, processes, products, know-how and technologies. This information is regarded as our trade secrets. All trade secrets must be kept confidential and secure. In addition to protecting our own trade secrets, we must respect the trade secrets of others also.

Any creation or invention that you make as an Indorama employee is the rightful property and trade secret of the Company.

If you have a question as to whether particular information is a trade secret, ask your supervisor.

Article 10 INSIDER TRADING

It is illegal to buy or sell stock or other securities on the basis of insider information. It is also illegal to communicate (or “tip”) insider information to others so that they may buy or sell stock or other securities. If you are aware of material nonpublic information about Indorama or any other company, including our suppliers or business partners, you are prohibited from trading (directly or indirectly) or tipping others to trade in the stock or other securities of those companies. The same restrictions apply to any person who lives in your household or who is financially dependent on you.

Insider information is any non-public information that a reasonable investor is likely to consider important in making an investment decision. Common examples of insider information include:

- Earning projections.
- News of a significant or pending merger, acquisition, or tender offer.
- News of a significant sale or disposition of assets.
- Changes in dividend policy, the declaration of a stock split, or the offering of additional securities.
- Changes in management.
- Significant new products or discoveries.
- Impending bankruptcy or financial liquidity problems.
- Gain or loss of a significant supplier or customer.
- Possible awarding or cancellation of a significant contract.

Article 11 SAFEGUARD OF ASSETS

Indorama’s property should be used for business purposes only and should not be used for any personal gain. You are responsible for conserving Indorama’s property under your control and should take reasonable steps to protect it from theft, misuse, loss, damage or sabotage.

Guidelines:

- Do not connect a modem to any computer in Indorama’s offices without prior approval of the IT department.
- Do not use Indorama letterhead for personal or non-business letters.
- Safeguard all physical, financial, and other company assets.

Article 12 MEDIA STATEMENTS

You may not make any statement (written or verbal) on behalf of or pertaining to Indorama to the media, news publications, trade publications or any other public channel of communication without prior approval from Corporate Office. Also, you may not respond to an inquiry from outside media yourself without prior consultation and approval from Corporate Office.

Article 13 MUTUAL RESPECT

All employees must treat each other with dignity and respect. They should be fair and courteous in all of their interactions in the workplace. By demonstrating our commitment to fairness and equal opportunity, we build relationships of mutual respect and trust.

Indorama will not tolerate any form of racism, like vilification behavior that encourages others to hate, disrespect, or abuse a person or group of people because of their race, color, culture or religion. This includes verbal, written, online communications or physical behavior towards any employee, business associates or other stakeholders.

Article 14 NO DISCRIMINATION

Indorama will not tolerate discrimination in employment or organizational decisions on the basis of race, color, age, sex, religion, disability, ethnicity, national origin, regional origin, marital status or any other legally protected status. Also, any such discrimination against a customer, supplier, service provider, or business partner is strictly disallowed.

Review your own decisions to ensure that merit and business considerations, instead of prejudice, stereotype or bias, drive your actions.

Article 15 HARASSMENT & INAPPROPRIATE PHYSICAL CONDUCT

Harassment of any type, whether directed at an Indorama employee, supplier, customer or anyone doing business with Indorama, will not be tolerated. Harassment is broadly defined and includes conduct, which negatively interferes with work performance, diminishes the dignity of any person or which creates an intimidating, hostile or otherwise offensive work environment.

Verbal, visual, or physical conduct of a sexual nature is unacceptable in the work place.

Examples include:

- Sexual advances, requests for sexual favors, foul language, inappropriate jokes, remarks about a person's body or sexual activities;
- Displaying sexually suggestive pictures or objects, suggestive looks or leering;

Indorama will also not tolerate violent acts or threats of violence on Indorama property or while doing business with Indorama.

Guidelines:

- Do not make insulting or offensive remarks. If one of your comments or jokes offends someone else, it may be construed as harassment.
- If you are upset by a person's choice of words, speak up and tell that person. Explain why the comments offend you, and ask the person to stop.
- Avoid making jokes or comments or using nicknames if you question their appropriateness.
- Do not show favoritism on assessments / evaluations or in other actions based on personal relationship.
- Immediately report any act of harassment or inappropriate physical conduct.

Article 16 IMMIGRATION

Indorama is fully committed to hire, recruit, or refer anyone who is legally authorized to work in country of work. It is mandatory to inspect, verify, and document the identity and employment authorization of every employee.

Indorama requires that all employment agencies, contractors and others doing business with Indorama fully comply with local immigration laws.

Article 17 FRATERNIZATION

Employees are expected to conduct themselves in a manner that promotes respect, trust, safety, and efficiency in the workplace. You may not date or become romantically involved with another member if you can influence that person's terms and conditions of employment or if that person can influence the terms and conditions of your employment.

In case of romantic involvement, especially when there is a reporting relationship between the concerned employees, the HR department should be informed so that transfers may be made to ensure that a reporting relationship does not continue.

Article 18 ALCOHOL AND DRUG ABUSE

Indorama is committed to a drug and alcohol free work environment. At all times, Indorama wishes to maintain high standards of professional conduct amongst its employees

Indorama requires all job applicants to be drug screened as part of the hiring process. Any applicant who tests positive for illegal drug use will not be hired. Where permitted by law, you may also be subject to random testing or specific testing if there is a reasonable basis to suspect you are under the influence of drugs or alcohol.

Guidelines:

- Seek professional help if you have a problem with substance abuse before it adversely affects you personally or professionally.

Article 19 DRIVING

It is illegal to drive without a valid local or international driving license. Also, it is illegal to drive under the influence of alcohol. In the event that authorities detain an employee on the account of such offenses, or any other driving offenses, the Company will not be responsible and will uphold the law.

Article 20

SUPPLIERS, TRADING PARTNERS, AND BUSINESS PARTNERS

Indorama bases its relationships with suppliers, trading partners, and business partners on lawful, efficient and fair business practices. The selection of suppliers must be made on the basis of objective criteria; including quality, price, delivery, adherence to schedules, product suitability, adequate source of supply, and Indorama's purchasing practices and procedures. Suppliers must be treated with respect, fairness and honesty keeping Indorama's business objectives in view. We also expect our suppliers and partners to follow all applicable legal requirements in their business practices and to operate ethically.

Guidelines:

- Current or potential suppliers and/or partners should not be approached about providing employment for your family members or friends.
- Indorama will not do business with former employees if a conflict of interest exists between his/her former position at Indorama and his/her new position.
- Do not direct business to a supplier/partner owned or managed by a relative or close friend.
- Employees who are involved in proposals, bid preparations or contract negotiations must be certain that all statements, communications and representations are accurate and truthful.
- Do not have social or other relationships with suppliers/partners, if such relationship would create the appearance of impropriety or give the perception that undue business influence is being exerted.
- Be watchful for suppliers/partners who violate worker safety, environmental, human rights, or other legal requirements and promptly report any such activities to your supervisor.

Article 21

ENVIRONMENT, HEALTH AND SAFETY

Indorama is committed to employee health, safety, protection of the environment, and to conducting business in compliance with all applicable laws. Employees must always comply with all relevant environmental, health, and safety laws and rules.

Guidelines:

- Reduce waste and dispose of toxic or hazardous materials responsibly and as per laws.
- Respect the environmental rights and interests of our neighbors and communities around Indorama's operating locations.
- Create and maintain a safe working environment.
- Help to prevent accidents and injuries.
- Avoid unsafe activities and conditions, including blocking fire exits, improper shelving of inventory and obstructing aisles.
- Follow all company policies and directives relating to the environment, health and safety.

Article 22

GOVERNMENTAL DEALINGS & POLITICAL ACTIVITIES

No political contribution or use of company property, services or other assets for political purposes may be made without the prior approval of the Group Managing Director. Indirect expenditures on behalf of a candidate or an elected official, such as travel or use of telephones, e-mail, and other corporate equipment, are subject to the same prohibitions.

You may not enter into any contract with any governmental entity involving the sale of products or services

without written approval from the management.

Guidelines:

- Except as required by law or allowed by management, employees may not use their work time or other employees' work time for political activities.
- You may not use your job title or Indorama affiliation in connection with the support, endorsement, or testimonial of a political candidate or organization without prior approval.
- Inquiries from government investigators must be answered accurately in accordance with the guidance's issued by competent authority.

Article 23 INTERNATIONAL TRADE

International trade is regulated through means of various international, bilateral and multi-lateral treaties, and local economic policies and regulations.

Federal agencies at times administer a variety of embargoes and sanctions programs against a number of countries, as well as nationals of those countries, because of activities deemed contrary to the interests of their country and the interests of their allies. Transactions with certain designated individuals and criminal organizations, such as terrorist organizations, narcotics traffickers and weapons proliferators, are also prohibited. Severe civil and/or criminal penalties may be levied against companies or individuals that violate these regulations. Always consult with your supervisor prior to entering into international trade negotiations or transactions with any such organizations/countries that you suspect might be object of governmental restrictions.

Guidelines:

- Follow all relevant international trade control regulations, including licensing, shipping documentation, duty requirements, import/export documentation, and reporting and record retention requirements of all countries in which you conduct business.
- Understand which party in an international trade transaction is responsible for the accuracy of trade documentation and ensure that Indorama has properly discharged its obligations in the transaction.
- You are responsible for knowing with whom you are dealing when it comes to international trade.
- You must not do anything that would facilitate business with any embargoed country.

Article 24 DATA SECURITY

Data security is crucial for the continuity of our business. In order to protect information, systems, and data, security measures are necessary. All employees must act responsibly to protect their information systems and data, while also comply fully with IT security rules.

Guidelines:

- Do not disclose your login credentials to any other(s) and ensure only legitimate use of your login credentials on systems, applications and data
- Your password should consist of at least six characters including at least one number. Passwords should not be based on names, birthday dates, or anniversary dates of yourself or close family members.
- Ensure that your computer is not accessible in your absence. You must password lock your computer to prevent unauthorized access. Use a password protected screensaver.

- You must allow automatic virus update to be uploaded by connecting to local network or internet regularly.
- You should never install any unauthorized hardware or software without prior approval from the IT department.

V. Environment Protection Policy

ENVIRONMENT PROTECTION POLICY

Indorama recognizes that our business, especially our manufacturing activities, has an impact on the environment. We are committed to preventing and reducing any adverse environmental impact from our actions and ensuring that we follow the best practices for the same. We are committed to complying with global industry standards and meeting, if not exceeding, all legal requirements. We are also committed to making continuous improvements in our environmental performance, including regular training of our employees about environmental issues and practices. In addition to our own impact, we will also help and ensure that our business partners are responsible to the environment protection.

We will actively seek ways to reduce our energy consumption, waste, negative emissions, and consumption of resources while improving our recycling and management practices.

We will continue to take measures to reduce our carbon footprint, such as ensuring that computers are in sleep mode or switched off after use; promoting the use of electronic communications and products; recycling waste paper, print cartridges, kitchen waste, and electronic equipment; encouraging employees to implement car share and use of company buses /cycles to work programs.

We will make use of renewable energies where economically viable; use low-energy bulbs and energy efficient equipment; use teleconferencing facilities to reduce travelling to meetings and lower our carbon footprint.

We will continue to be a responsible neighbor in the communities in which we operate and support the quality of community life.

Every site will maintain an internal management structure for the management of environmental issues with clearly defined responsibilities. We will regularly monitor our environmental performance and set objectives and targets for improvement.

CLIMATE CHANGE

Climate change has now been recognized as an international issue. We are therefore committed to reducing the greenhouse gas emissions from our operations in a way that supports national strategies and in line with our commitment to our stakeholders to provide a sustainable business.

Our key climate change commitments are to assess the potential impact on our business from evolving climate change policies as part of our on-going risk management processes and to work actively with our key suppliers to improve the reduction of waste.

VI. Health and Safety Policy

HEALTH AND SAFETY POLICY

Our health & safety policy is to provide and maintain a safe and healthy working environment to our employees & contractors and provide adequate safeguards against risks associated with our work activities.

We believe that excellence in health and safety results in excellent business growth and that everyone has a role to play in preventing injuries and illnesses. To achieve these goals, health and safety must be integrated into all business management processes.

We believe that all injuries and work related illnesses can and must be prevented; that site management is accountable for their site's health and safety performance.

We will ensure the safe handling and use of chemical substances and in order to do this, we will also provide such information, training, and supervision, as is required to meet this goal. Training will advance a strong safety culture that will become a part of our DNA and will effectively prevent accidents.

All employees have the responsibility to comply with company guidelines to achieve a safe & healthy workplace, to take reasonable care of themselves & others and not to interfere with anything provided to safeguard their health and safety.

We will work energetically towards our ultimate goal of zero accidents and injuries. We will drive the implementation and continuous improvement of safety and health training and communication with employees, contractors and other stakeholders.

PRODUCT SAFETY

Our policy extends to our products and at eliminating any potential harmful effects on our customers. It is very important that our business partners and we ensure ingredients and products meet the requisite quality standards. We expect business partners to immediately report to us any concerns about product safety.

MANAGEMENT STRUCTURE & RISK ASSESSMENTS

Every site will have a health and safety department manned by full-time employees. They will have clearly defined responsibilities, which will include (but not be limited to); overseeing compliance by employees and contractors, communicating and training about health and safety policies, issues, and practices, analysis of safety violations, safety audits, implementation of policies and new practices, and continuous improvement.

Risk assessments will be undertaken by sites regularly to ensure that current procedures are still appropriate for the associated risks. They will also be reviewed when the existing equipment or manufacturing process are changed or new ones installed.

VII. Human Rights Policy

HUMAN RIGHTS POLICY

Indorama strongly believes in respecting all human rights. We are committed to respecting human rights as embodied in the [Universal Declaration of Human Rights](#) and its two corresponding covenants, [The International Covenant on Civil and Political Rights](#) and [The International Covenant on Economic, Social, and Cultural Rights](#). We will avoid infringing on human rights and comply with the laws of the countries in which we do business.

RESPECT FOR HUMAN RIGHTS

We respect the rights of our employees and all other stakeholders and shall not discriminate against anyone based on their ideological views, race, color, religion, gender, sexual orientation, national origin, age, disability, or any status regarded as a human right. We will adopt reasonable and inclusive practices throughout our operations and will seek to eradicate prejudice, discrimination, bullying and harassment.

FAIR TREATMENT OF EMPLOYEES

We will treat all employees with utmost fairness & honesty, regardless of where they work. We value a workplace where all employees are considerate of others and where each person shows fairness and respect for each other in daily interactions. Fair treatment and cordial interactions give colleagues the comfort to introduce new ideas, constructively challenge current thinking, and work knowing that others will appreciate their contributions. A cordial workplace creates opportunity for employees to make a difference, leading us to innovate for our internal and external customers.

RECRUITMENT

All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavor to ensure there are no barriers to employment of suitable candidates.

CHILD LABOR

We will not employ child labor, forced or bonded labor, or allow forced overtime. No person shall be employed unless such employment is in compliance with all applicable laws and regulations concerning age, hours, compensation, health and safety.

DISCIPLINARY ISSUES

We will not use corporal punishment, mental or physical coercion or verbal abuse. Disciplinary procedures that we have will be enforced for any member of staff whose conduct falls below the required standard.

RESPONSIBILITY OF EMPLOYEES

All employees have a personal responsibility for the practical application of this policy in their day-to-day

activities and must comply with the policy at all times.

Non-compliance with this policy will be treated seriously and will not be tolerated.

GRIEVANCE PROCEDURES

We have grievance procedures through which employees can raise personal and work-related issues. Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimization has the right to pursue the complaint through our grievance procedures.

VIII. Intellectual Property Rights

INTELLECTUAL PROPERTY RIGHTS

We will protect the Intellectual Property Rights (IPR) of others, as we would like them to respect ours. Intellectual property may typically take the form of copyrights, patents, trademarks or trade secrets. The formal definition, according to the World Intellectual Property Organization is “creations of the mind.” Intellectual property includes information such as inventions, creations, innovations, discoveries, and improvements generated, obtained or gathered by companies, including their patents, copyrights, trademarks, trade secrets and related confidential business information.

Our policy on intellectual property rights is to observe laws and regulations associated with them, to protect the results of intellectual activities with the rights and make extensive use of those rights, and to respect the legitimate intellectual property rights of third parties. We have a system with which to register trademarks and brands in order to protect them for our own use. We will not knowingly infringe upon the IPR of a third party, whether through the use of hardware or software for which we have acquired through purchase or hire.

SOFTWARE USE

Corporate software will be purchased from legitimate sources for which the company has the legal right to use that software.

It is our company’s policy to use licensed software only in accordance with the terms of its license agreement. Violating a license agreement is illegal and may subject the Company to prosecution and substantial monetary penalties. Therefore, the employees should not do any of the following without the permission of the IT department.

- Install Company software on a non-company computer;
- Make a copy of any Company software program for any reason;
- Install any software program on any Company computer;

Audits may be done on company-owned computers at any time to ensure compliance with this policy.

COMPANY INTELLECTUAL PROPERTY AND TRADE SECRETS

The general policy of the Company is that a person who creates a work privately is the author of that work, unless the work is "work made for hire." A "work made for hire" is a work prepared by an employee within the scope of his / her employment or a work specially ordered or commissioned for use as a contribution to a collective work. The Company pays its employees for work, some of which includes to create or improve products or systems whether implemented or not.

Therefore, the company shall remain the owner of all intellectual property created by its employees and this will remain as company’s property even after those employees have left the company.

Trade secrets are a part of our intellectual property and may be tangible or intangible, for example a strategy to increase work efficiency. We expect current and former employees to maintain our trade secrets.

Unless a written agreement is entered into specifying ownership or assignment of rights, the Company does not own the intellectual property rights of a commissioned work that is performed by a consultant or independent contractor.

CONFIDENTIALITY

All parties are to respect the confidentiality of our Intellectual Property including trade secrets. We reserve the right to take legal action to enforce our rights if we believe anyone has abused information or sought to gain from our property and trade secrets.

IX. Policy on Treatment of Customers

CUSTOMER TREATMENT POLICY

Indorama is committed to the highest standards of product safety, quality, and business integrity in order to meet our customers' expectation and to achieve Customer Delight.

Company wins and maintains long-term customer relationships based on the quality and value of its products and services. So, it is critical that we market them responsibly and sell on their legitimate features and benefits. Our customers trust our word because we demonstrate integrity and honesty in our activities. We create value for our customers because we provide the information they need to make the best purchasing decisions. It is never worth the risk to our well-won reputation to engage in any inappropriate marketing practices.

1. We are committed to developing and providing quality products to meet the satisfaction of customers.
2. We are committed to do research and development on our products on a regular basis in order to control our product quality and provide new products for our customers.
3. We will provide accurate, sufficient and useful information to customers without exaggeration. We will not provide any false information that mislead our customers.
4. We respects individual rights of customers and will keep customers' information confidential.
5. We provide channels for customers to file complaints relating to the quality of products and services and try our best to promptly address their complaints.
6. We provide support for various activities in order to strengthen and maintain a good relationship with all our customers.



Acknowledgement Form for Code of Conduct

I have received, read, and I will strictly comply with Indorama's Code of Conduct.

Employee Name & Code

Date

Employee Signature