

January 1, 2018

# Code of Conduct

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The Code of Conduct (the “Code”) is applicable to all employees, Board of Commissioners, and 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 outlines specific principles and policies covering key ethical issues. It will identify risk areas that employees may encounter in their job and provide guidelines on how employees should conduct themselves. In the event of any doubt, suitable guidance should be taken from superiors and/or the respective HR department.

## 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 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, employees who raise ethical issues should be recognized and appreciated.

## Article 3: DISCIPLINARY ACTIONS FOR VIOLATIONS

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

## Article 4: HOW TO RAISE A CONCERN

Concerns or possible violations of these guidelines (or other Indorama policies) may be reported 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 the misconduct should be reported to the next level of management or a member of senior management. It is the responsibility of the receiving member to promptly escalate the matter to his/her superiors

**Confidential Reporting.** Each Company will have specific guidelines for reporting concerns or possible violations confidentially by email, phone, and/or mail to third parties or the Corporate Office.

## 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 their superior. If an employee has received anything in the form of gift or 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 an employee take actions or has interests that are inconsistent with the interests of Indorama or that may interfere with their ability to perform their job impartially and to the best of their ability on behalf of the Company.

Employees are responsible for advancing Indorama's business interests when the opportunity to do so arises. They may not take any opportunity or use any confidential information for their personal benefit, or for the benefit of their friends or family members.

Employees may also not use their position in Indorama or any of Indorama's resources, property or information for their, their friends, or family members' personal gains or benefit.

## Article 7: CULTURAL SENSITIVITY

We operate in many different countries and amidst diverse cultures. Foreign employees are expected to learn, understand, and respect local customs and culture and not cause offense to local sentiments in any way.

## Article 8: GIFTS AND GRATITUDES

Employees 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, etc.) which are under value of \$100 are exempt.

Any other gift or gratitude received must be returned on the pretext of company policy. If return is impractical, any gift that is not returned should be reported to the supervisor and should be deposited with the HR or commercial department for re-use or for other purposes.

Any offer of a gift or gratitude must be reported to the supervisor also.

## Article 9: CONFIDENTIAL INFORMATION

All employees should be fully aware of and strictly keep the company's information and documents confidential and shall not divulge or disclose the same 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.

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

Confidential information must not be divulged to anyone outside the company without the written approval of the 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.

## Article 10: 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 employees make as an Indorama employee is the rightful property and trade secret of the Company.

## Article 11: INSIDER TRADING

It is illegal to buy/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/sell stock or other securities. If employees are aware of material non-public information about Indorama or any other company, including our suppliers, customers, or business partners, they 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 home 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; or
- Possible award or cancellation of a significant contract.

## Article 12: SAFEGUARD OF ASSETS

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

Indorama letterhead may not be used for personal or non-business purposes.

## Article 13: MEDIA STATEMENTS

Employees 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 with Corporate Office.

## Article 14: 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 15: 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.

## Article 16: 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.

## Article 17: IMMIGRATION

Indorama is committed to following all local immigration rules pertaining to recruitment and employment of foreign workers.

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

## Article 18: FRATERNIZATION

Employees are expected to conduct themselves in a manner that promotes respect, trust, safety, and efficiency in the workplace. Employees should not become romantically involved with another member if either person can influence the other person's terms and conditions of 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 19: ALCOHOL AND DRUG ABUSE

Indorama is committed to a drug and alcohol free work environment. If any employee is found to be under the influence of drugs or alcohol during work, the company reserves the right to terminate the contract immediately.

Indorama requires 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, employees also be subject to random testing or specific testing if there is a reasonable basis to suspect they are under the influence of drugs or alcohol.

## Article 20: SUPPLIERS, TRADING PARTNERS, & 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 one's 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 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; and,
- 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;
- Dispose of toxic or hazardous materials responsibly and as per applicable laws;
- Respect the environmental rights and interests of our neighbors and local communities;
- Create and maintain a safe working environment;
- Prevent accidents and injuries;
- Avoid unsafe activities and conditions, including blocking fire exits, improper storage of inventory, and obstructing aisles; and,
- Follow all company policies and directives relating to the environment, health and safety.

## Article 22: GOVERNMENTAL DEALINGS & POLITICAL ACTIVITIES

Except as required by law or allowed by management, employees may not use their work time or other employees' work time for political activities. Employees may not use their 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 against 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 strictly 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 sanctions.

**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;
- Employees are responsible for knowing with whom they are dealing with; and,
- The Company may provide more detailed guidelines from time to time on how to deal with specific sanctioned countries.

## 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 take responsibility to protect their information systems and data and comply fully with internal IT security rules.