

Forced Labor in Canadian Supply Chains Report for Financial Year 2023

LyondellBasell Industries N.V. (together with its consolidated subsidiaries, “LYB”) is committed to conducting business in an ethical and responsible manner, which includes complying with applicable slavery, forced labor and human trafficking laws. This joint statement is prepared on behalf of Lyondell Chemical Company, Equistar Chemicals, LP, LyondellBasell Advanced Polymers Inc., and LyondellBasell Acetyls, LLC (collectively referred to as the “**Reporting Entities**”) pursuant to The Canada Fighting Against Forced Labor and Child Labor in Supply Chains Act (the “**Act**”). This statement sets out the actions taken to prevent and reduce the risk that forced labor or child labor was used by the Reporting Entities or in their supply chains during the financial year ended December 31, 2023.

Structure, Activities, and Supply Chains

LYB participates globally across the petrochemical value chain and is an industry leader in many of its product lines. Each of the Reporting Entities is a wholly owned subsidiary of LYB. LYB manages its operations through six operating segments: Olefins and Polyolefins-Americas; Olefins and Polyolefins-Europe, Asia, International; Intermediates and Derivatives; Advanced Polymer Solutions; Refining; and Technology.

LYB’s chemicals businesses consist primarily of large processing plants that convert large volumes of liquid and gaseous hydrocarbon feedstocks into plastic resins and other chemicals. These chemical products tend to be basic building blocks for other chemicals and plastics, which customers use to manufacture a wide range of products that people use in their everyday lives including food packaging, home furnishings, automotive components, paints and coatings. LYB’s refining business processes crude oil into refined products such as gasoline and distillates. LYB also develops and licenses chemical and polyolefin process technologies and manufactures and sells polyolefin catalysts.

The feedstocks and raw materials used in the Reporting Entities’ businesses are either purchased from third parties or supplied from other LYB entities. In addition to feedstocks and raw materials, the Reporting Entities’ sites and office locations source technical services and materials, machinery and equipment, corporate services, logistics services, utilities, and IT-related hardware and software from third parties.

Policies and Due Diligence Processes

LYB is committed to conducting business in an ethical and responsible manner, which includes complying with applicable slavery, forced labor, child labor and human trafficking laws. LYB has adopted, and each of the Reporting Entities is subject to, the policies and practices described below to mitigate the risk of child and forced labor taking place in its operations and supply chains.

LyondellBasell’s Code of Conduct

LYB’s Code of Conduct (the “**Code**”) embodies its dedication to conducting business ethically and responsibly by obeying the law and enabling a safe and productive work environment. The Code forbids the use of forced, bonded (including debt bondage),

indentured, or involuntary labor, exploitative prison labor, slavery, child labor, or trafficking in LYB's operations. The Code also prohibits: harsh or inhumane treatment of all workers, including actual or threatened corporal punishment; retention of passports or other original employee documents unless required by law and restriction of employee access to such documents; and charging of any fee for employment or any refundable security deposit to be paid for employment purposes. For purposes of employment, LYB defines "child" as anyone under sixteen years of age, unless national or local law stipulates a higher mandatory school leaving or minimum working age, in which case the higher age applies. LYB does not hire people under the applicable mandatory minimum.

All employees, officers, directors, and anyone doing business on behalf of LYB are expected to know and abide by the Code all times. Training on the content and application of the Code is mandatory for all employees, and each employee must annually acknowledge that they have read, understood, and agree to comply with the Code. LYB takes seriously and fully investigates all potential Code violations.

LYB expects all employees to report possible violations or concerns regarding the Code. LYB offers an independent whistleblower helpline and website, EthicsPoint, that enables anyone to report complaints and violations of law and regulations anonymously. The failure to report any suspected Code violation or misconduct immediately may also be considered a violation of the Code. When an allegation of an employee Code violation is substantiated, the relevant management team reviews the investigation findings and determines disciplinary action consistent with the severity of the violation. Disciplinary action can include verbal or written warning, suspension with or without pay, demotion or, for the most serious offenses or repeated misconduct, employment termination.

LYB's Supplier Code of Conduct and Global Procurement Policy

LYB has adopted and incorporated in its standard contracts and purchase order terms and conditions a Supplier Code of Conduct that sets forth LYB's expectations for vendors to comply with applicable law, protect internationally recognized human rights and prohibit the use of forced, indentured or involuntary labor (including modern slavery and human trafficking) and child labor. The Supplier Code of Conduct establishes human rights expectations for LYB's supply chain, including the Reporting Entities' supply chains, in accordance with applicable legal requirements. Compliance with the principles in the Supplier Code of Conduct is evaluated through suppliers' risk assessments, ratings, sustainability assessments, and audits. Non-adherence with the Supplier Code of Conduct or failure to correct violations may result in LYB taking appropriate steps regarding its relationship with a supplier, which may include suspending or ending the business relationship. LYB has also adopted a Global Procurement Policy that outlines the requirements any function needs to follow when purchasing goods and services on behalf of LYB, including a requirement to implement processes to ensure compliance with LYB's Human Rights Policy. In 2023, LYB formed its Global Sustainable Procurement program to accelerate sustainability in its supply chain.

LYB's Human Rights Policy

LYB has adopted a comprehensive Human Rights Policy that sets forth its commitment to respecting human rights throughout its global operations. The Human Rights Policy establishes minimum standards for the following fundamental aspects of human and labor rights: workforce health and safety; prevention of discrimination, harassment and retaliation; diversity, equity and inclusion; workplace security; working conditions and fair wages; freedom of association; freely chosen employment; and child labor protections. The Human Rights Policy is guided by common principles found within the United Nations Universal Declaration on Human Rights and Guiding Principles for Business and Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, among other guidelines.

Assessing Risk and Auditing Compliance

LYB has implemented the following policies and initiatives to assess risk and audit compliance, which the Reporting Entities are subject to:

Whistleblower Policy

LYB has implemented a whistleblower policy and enabled anonymous reporting channels for employees and the public through an independent whistleblower helpline and website, EthicsPoint. For EU countries, LYB has adopted an EU Whistleblower Policy setting out applicable reporting procedures and protections for those who raise concerns. LYB's Chief Compliance Officer, who has a direct reporting line to the Audit Committee, provides regular reports to the Audit Committee on compliance with the Code, related training programs, and complaints received and investigated by the compliance function.

Authorized Economic Operator (AEO) in the European Union

Since 2010, LYB has actively participated in the AEO program in the European Union. AEO is a voluntary certification program which aims to enhance international supply chain security, facilitate legitimate trade and ensure the integrity of the global supply chain. The AEO certification is granted by national customs authorities according to uniform criteria and requires, inter alia, high-level of control of the flows of goods and the absence of serious or repeated infringements of customs legislation and taxation rules, including no record of serious criminal offences relating to the economic activity of the AEO. The AEO program involves customs audits prior to granting AEO certification, and continuous supervision by customs authorities (including ad-hoc audits) of the activities of already AEO certified companies.

U.S. Customs – Trade Partnership Against Terrorism (C-TPAT)

LYB has actively participated in the U.S. C-TPAT program since 2003. Like AEO, C-TPAT is a voluntary U.S. government program designed to increase security throughout the global supply chain. The C-TPAT program involves risk-based audits of program participants and unannounced audits of their suppliers.

Sustainable Procurement Program Assessments and Audits

LYB utilizes EcoVadis assessments and Together for Sustainability ("TfS") and other audits to monitor its supply chain, identify potential risks, and facilitate dialogues with suppliers to improve their practices.

In 2023, LYB completed a supplier risk mapping project using the EcoVadis risk platform, IQ Plus, to gain a detailed view of sustainability risks by topic, including those related to child and forced labor. Based on the risk mapping, LYB requests certain suppliers to complete an EcoVadis sustainability assessment or a TfS audit. As of December 31, 2023, more than 1,500 suppliers were assessed. LYB's global supplier engagement team onboards suppliers to EcoVadis, requests corrective actions to improve on any issues and mitigate risks, and supports suppliers in addressing improvement areas. TfS audits are conducted by an external accredited auditor and examine key aspects of a site's management, environment, health and safety, and labor and human rights. LYB also utilizes non-TfS audits to identify human rights risks in its supply chain.

The Reporting Entities primarily operate in industries and countries that are significantly regulated and have modern employment conditions. LYB has conducted a high-level assessment of its procurement categories and has identified the following supply chains which may have higher inherent risk of human rights issues:

- Manufacture of equipment and machinery
- Extraction or mining of crude petroleum, natural gas, and metal ores
- Manufacture of chemical products, fertilizers and nitrogen compounds, plastics and synthetic rubber
- Shipping, warehousing, and storage

Effectiveness and Remediation

Through the policies, activities and reporting described above, the Reporting Entities have not identified any incidents of forced labor or child labor that require remediation.

While LYB, including the Reporting Entities, frequently reviews its policies and procedures, the initiatives listed above represent the current extent of the Reporting Entities' (1) verification of product supply chains to evaluate and address slavery, child labor, and human trafficking risks in furtherance of the Act (LYB may not conduct such verifications through third-parties); (2) auditing of suppliers to evaluate supplier compliance with LYB's standards regarding the Act (LYB does not necessarily conduct such audits in an independent or unannounced manner); (3) requirements of direct suppliers to certify that the materials incorporated in the Reporting Entities' products comply with laws regarding slavery, child labor, and human trafficking in the countries where the suppliers do business; (4) maintenance of internal standards and processes for employees and contractors who fail to meet company standards regarding the Act; and (5) the provision of training for employees who have direct responsibility for supply chain management on this subject matter.

In accordance with the requirements of the Act, and in particular section 11 thereof, this statement has also been approved by the following individuals on behalf of each Reporting Entity. The below signed attest that they have reviewed the information contained in the report for Lyondell Chemical Company, Equistar Chemicals, LP, LyondellBasell Acetyls, LLC, and LyondellBasell Advanced Polymers Inc., as applicable, and based on their knowledge and having exercised reasonable diligence, the information in the report is true, accurate and complete in all material respects for the purposes of the Act for 2023.

LyondellBasell Finance Company

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