

Everything you do affects others.....

*Do the right thing.*

At Sadara, we are passionate about our mission and our role as a trend-setter – a leader. We believe in the potential of our Company to bring change to the Kingdom of Saudi Arabia in many different and positive ways – from the products we produce to the jobs and opportunities we will create - we are dedicated to improve the economy of a nation and the standard of living for its people. However, our mission will not be accomplished unless we are equally focused on “how” we accomplish it, as well as on the “results” of our collective labor. Values of Integrity, Respect for People and the Protection of Our Planet are goals of our corporate culture and are reflected through the Sadara Code of Conduct. It is this code of conduct that guides our behavior both within and outside of our work environment. It is our responsibility to reflect the best examples of a corporate citizen to not only our business associates, but also to our families and friends; and in that way, Sadara will help lead the way to positive change.

Best Regards,

---

**Ziad Al-Laban, Chief Executive Officer**

# INDEX

<b>INDEX</b>	<b>2</b>
<b>LIVING OUR VALUES</b>	<b>4</b>
Everyone’s Responsibility	4
Responsibilities of Supervisors and Leaders	4
Speak Up and Whistleblowing	4
No Retaliation	4
The Code, the Law and Company Policy	4
<b>PEOPLE</b>	<b>5</b>
Equal Employment Opportunity and Respect in the Workplace	5
Labor Policy	5
Harassment	5
Responsibility	6
Health and Safety in the Workplace	6
Substance Abuse in the Workplace	7
Violence in the Workplace	7
<b>BUSINESS</b>	<b>7</b>
Conflicts of Interest	7
Outside Interests	8
Outside Employment	8
Speaking at Conferences	8
Relatives, Friends and Personal Relationships	8
Gifts and Entertainment	9
Bribery and Corruption	9
Government Officials	10
Business and Financial Records	10
Use and Protection of Company Resources and Information/Confidentiality	11
Intellectual Property	11
Information Technology	11
Third Party Confidential Information	11
Proprietary Information and Records Management	12
Sadara as a Service Provider or Supplier	12
Data Privacy	12
Inside Information and Trading	12
Contract Clause	13
Voiding and Rescinding Contracts	13
Competition	14
Antitrust and Competition	14
Gathering Competitive Information	14

Trade Controls	14
<b>CITIZENSHIP</b>	<b>15</b>
Setting the Standard for Sustainability	15
Corporate Citizenship	15
Charitable Activities and Volunteerism	15
Communications with the Public	16
Social Media	16
<b>ADMINISTRATION OF THE CODE</b>	<b>16</b>
Office of Ethics & Compliance	16
Investigation and Response	16
Acknowledgement	17
Waiver	17
Contacts	18

## LIVING OUR VALUES

This Sadara Code of Conduct (“**Code**”) provides a framework to make good choices: to abide by the law and be highly principled and socially responsible in all our business practices.

It applies to all employees, agents and representatives of Sadara Chemical Company and its subsidiaries (“**Sadara**” or “**the Company**”), and serves as a guide as to how Sadara will engage with all individuals and organizations who supply goods or services to Sadara. (“**Suppliers**”).

### EVERYONE’S RESPONSIBILITY

During the course of business, each one of us will be faced with situations where the right answer may not be obvious. The Code can guide us, but it cannot address every circumstance. Our first responsibility in all instances is to avoid even the appearance of improper behavior. We must abide by all applicable laws, respect the values of our society and, when in doubt, seek counsel for guidance and assistance as more fully explained in this Code.

### RESPONSIBILITIES OF SUPERVISORS AND LEADERS

Actions speak louder than words, and we hold our leaders to the highest standard. Supervisors are expected to model appropriate behavior, ensure that employees have the resources they need to conduct business ethically, encourage discussion and be responsive to all appropriate concerns. We expect our supervisors and management to live up to and maintain the trust that has been bestowed upon them by the Company and its shareholders by demonstrating the highest standards of ethical behavior.

### SPEAK UP AND WHISTLEBLOWING

One measure of commitment to our values is how we treat each other. As employees, we have an obligation to behave in a manner that protects the Company’s business interests, our reputations and each other. This obligation includes taking action to promptly report any conduct inconsistent with the guidelines set out in this

Code, our policies or the law. Even if the facts of the situation are not entirely clear, each of us still has an obligation to report an incident of legitimate concern. All reports of misconduct are taken seriously and will be treated confidentially, consistent with a full and fair inquiry.

Questions or concerns may be discussed with:

- A Supervisor
- A Human Resources Representative
- An Ethics & Compliance Committee member
- A Law Department Attorney
- The Office of Ethics and Compliance – either directly or through the website ([http://sadara.com/en/about/Ethics and Compliance](http://sadara.com/en/about/Ethics_and_Compliance))

### NO RETALIATION

We respect those who raise legitimate concerns about suspected improper conduct. We understand that it can be a difficult and emotional decision to come forth and speak up. Sadara therefore has a ‘No Retaliation’ policy to any reasonable concern raised honestly. We will not tolerate retaliation against anyone who reports a potential violation in good faith. However, employees have a responsibility to only raise a legitimate complaint (i.e. not a false claim), and concerns should always be based upon good judgment and reasonable standards. Contact an Ethics and Compliance Committee member or Office of Ethics and Compliance if you believe an act or pattern of retaliation is committed against you or, in your presence, against another person.

### THE CODE, THE LAW AND COMPANY POLICY

Sadara’s corporate policies address many areas covered within this Code, however, it is important to recognize that the Code is only a guideline for our employees, whereas the Company policies and the applicable local laws are the basis for the matters discussed herein. As a global company, we must follow the laws of many countries and jurisdictions. If a section of the Code conflicts with applicable local law, then the local law takes precedence. If a section of the Code conflicts with the express provisions of a Company policy, then the policy terms will take precedence.

Please consult the Law Department or the Office of Ethics and Compliance if you have any questions about local laws, the Code or Company policies.

## PEOPLE

*Every one of **you** is an important part of **us**. The real value of any organization is the experience, dedication, skills, innovativeness of its most valuable resource; its people. The Company is its people.*

---

### EQUAL EMPLOYMENT OPPORTUNITY AND RESPECT IN THE WORKPLACE

When we respect the diversity of our workplace, we create an inclusive environment where everyone has the opportunity to perform to their highest potential.

- Sadara provides employment opportunities to qualified applicants.
- Hiring, promotion, compensation and other employment-related decisions are based on job-related factors. Sadara has a strict 'no discrimination' policy in its hiring practices.
- We strive to create an environment of mutual respect, free from harassment and unprofessional behavior. Bullying or threatening behavior, intentionally expressed or implied, is unacceptable. This includes any aggressive, threats – *expressed or implied*, intimidating or violent behavior that may create a hostile work environment.
- Conduct and statements that are intentionally degrading, offensive, humiliating or intimidating to others are unacceptable. Seemingly innocent actions can create an environment that may be offensive, and we should be aware and sensitive of our own behavior and the effect it may reasonably be construed to have on others.

### LABOR POLICY

Respect for human rights and dignity is a cornerstone of our business.

Sadara endeavors to take every step possible to guarantee all applicable employment rights given under the law; with full understanding that while we acknowledge that discrimination exists in every labor market in the world, Sadara can and will take steps to protect against any unfair advantages or disadvantages based on discriminatory factors. Sadara's goal is to always hire on the basis of "best candidate for the job."

Discriminatory biased decision-making and treatment, however, are not always conscious. We have taken our commitment to fair employment practices in accordance with the law to the heart of our corporate culture. Therefore, vigorous policy, and proactive prevention of discrimination – i.e., enhanced outreach, education, and technical assistance to promote compliance – is critical to ensuring that discrimination plays no part in employment decisions.

Sadara's pledges:

- We recognize, respect and will comply with all labor, employment and residency laws within the Kingdom of Saudi Arabia, and elsewhere where we conduct operations or have staff members in residence.
- We believe that working positively and directly with employees best serves their interests.
- We respect diversity in the work place.
- We strive to work cooperatively with duly chosen employee representatives in the common pursuit of the best interests of the employees and the Company's mission.
- We do not use forced or involuntary labor.
- We do not use child labor.

### HARASSMENT

Harassment is a particularly harmful form of inappropriate conduct and can create a very hostile work environment. It can include verbal assaults, name calling, unsolicited physical contact, offensive jokes, slurs, offensive nicknames or name calling, physical assaults or threats, intimidation, ridicule or mockery, insults or put-downs, offensive objects or pictures, and interference with work performance by creating a work environment that is uncomfortable or distressing for an employee. It can also include inappropriate pictures, posters, screen-savers, videos or e-mail messages.

Failing to provide a work environment free of all forms of harassment is not acceptable. Sadara will take every

reasonable step to ensure that the work environment is safe, healthy, and free from harassment.

The conduct need not be explicit in nature to violate Sadara's prohibition against discrimination. If reasonably perceived as hostile, then it must not be allowed to continue. To determine if a work environment is hostile, all of the circumstances should be considered. Incidents of harassment directed at other employees in addition to the offended party are relevant to a showing of hostile work environment.

There are two requirements for conduct to be considered harassment: (1) the conduct must be unwelcome; and (2) the conduct must be reasonably severe or persistent to alter the terms and conditions of employment in the mind of the alleged victim and from the perspective of a reasonable person placing himself or herself in the victim's position.

- **UNWELCOME CONDUCT:** The conduct must be unwelcome in the sense that the alleged victim reasonably *regarded it as undesirable or offensive*. When the conduct involves mistreatment or is derogatory in nature, to construe it as "unwelcome" usually is not an issue.
- **SEVERE OR PERSISTENT:** Abusive conduct does not have to be so severe that it causes economic or psychological injury. At the same time, conduct is not a violation just because it is uncomfortable, or inappropriate. The "severe or persistent" standard reflects a "middle path" between these extremes.

Harassment will be analyzed on a case-by-case basis, by looking at all the circumstances and the context. Relevant factors in evaluating whether harassment creates a sufficiently hostile work environment may include any of the following (no single factor is determinative):

- The frequency of the conduct;
- The severity of the conduct;
- Whether the conduct was physically threatening, humiliating or inappropriate in nature;
- Whether the conduct caused reasonable fear or concern to the employee in relation to their continued employment or promotion;
- Whether the conduct unreasonably interfered with the employee's work performance;
- The context in which the harassment occurred, as well as any other relevant factor;

- The more severe the harassment, the less persistent it needs to be, and vice versa. Accordingly, unless the harassment is quite severe, a single incident or isolated incidents of offensive conduct or remarks generally do not create an abusive working environment. But a single, extremely serious incident of harassment may be sufficient to constitute a violation, especially if the harassment is physical.

To protect employees from unlawful harassment, Sadara will periodically train employees on the applicable policies and procedures which the Company has adopted regarding these issues, and will vigorously follow and enforce compliance.

## RESPONSIBILITY

Employers and employees each have an essential role in preventing harassment. When employers and employees both take appropriate steps to prevent and correct harassment, offensive conduct generally will be corrected *before* escalating to the point of violating Company policy or local law. If an employee fails to report an incident to the proper Company representatives, the Company is not responsible for any outcome. The burden of raising an issue to the attention of the management or to the Office of Ethics and Compliance, rests with the employees. Any complaint of harassment or discrimination which is not made in good faith; i.e. a false claim, where the individual intentionally or knowingly makes a false claim to management, will subject the employee to disciplinary action as prescribed by Sadara's IR manual and the Company's Internal Work Rules.

## HEALTH AND SAFETY IN THE WORKPLACE

The Company and its employees should always use their best efforts to maintain a safe and healthy work environment and be committed to eliminating work-related injuries and illnesses, both within and outside of the workplace. Unsafe health and safety practices at home can impact work-related practices and our capacities to perform suitably in the workplace.

- Employees and the Company share the responsibility to make safety and health a daily priority.
- We support each other in actions to live safely and in good health by utilizing available resources and observing recommended practices.

- We are accountable to take corrective action when an unsafe or hazardous situation is brought to our attention.
- We are committed to traffic rules and safe driving practices whether while at work, to and from work, or in our personal circumstances.

*are essential parts of the bigger picture. You are the corner stone of this.*

---

## SUBSTANCE ABUSE IN THE WORKPLACE

Sadara is committed to the safety, health and security of its employees, our operations and all those who come into contact with them. We will not tolerate substance abuse in the workplace. Employees are expected to work free from the influence of any substance that could affect judgment or safety on the job.

In strict accordance with local laws, Sadara forbids use or entry of any illegal substances into the places of work. Anyone who is found in possession of, or consumes such substance in the work place, shall be subject to the punishments prescribed under the law. Sadara also reserves the right to conduct drug and alcohol testing of its employees and contractors, as permitted by local law.

## VIOLENCE IN THE WORKPLACE

Violence or threatened violence will not be tolerated in the workplace. Immediately report to a supervisor or Security any behavior or suspected behavior that has the potential to become violent or that threatens the safety of people or property. Sadara reserves the right to search any item on Company property for reasonable security reasons, including offices, desks, computers, purses, briefcases, automobiles, packages and lockers, at any time, as permitted by local law.

Weapons, firearms, ammunition, explosives and incendiary devices are prohibited on Company property and in Company vehicles. In some locations, the law provides limited exceptions when being used in connection with legitimate business activities, and only by individuals who are qualified and expressly authorized by the Company to use such devices in connection with performing their work for the Company.

## BUSINESS

*How we reach our goals is as important to us as reaching them. Transparency, accountability, integrity and honesty*

## CONFLICTS OF INTEREST

We are expected to avoid situations where personal interests conflict, *or even appear to conflict*, with those of the Company. This includes any activity that may cause others to doubt our fairness or interferes with our ability to perform our job objectively. If there is a chance that a situation might be perceived as a conflict of interest, we must disclose it to a supervisor, HR Services or the Office of Ethics and Compliance, to initiate steps to get it resolved.

Conflicts of interest can take many forms. This Code does not address every potential conflict of interest situation, so we must use good judgment and seek guidance when unsure. Common conflict of interest situations include:

- Having a financial or personal interest in a company that does business with Sadara. See also the section on *Outside Interests* in this Code.
- Receiving compensation or other incentives in excess of Company policy from a company that does business with Sadara.
- Holding a second job that interferes with our ability to do our job at Sadara.
- Hiring (or influencing the hire of) a supplier, distributor or other agent managed or owned by a relative or close friend.
- Engaging in an intimate or personal relationship with a person you report to, or who reports to you.

No Sadara employee involved in contracting activities shall knowingly award a contract to a Company employee or to a business associate or other organization owned or substantially owned or controlled by one or more Sadara employees. This policy or rule is intended to avoid any conflict of interest that might arise between the employees' interests and their Company duties and to avoid the appearance of favoritism or preferential treatment by the Company toward its employees.

## OUTSIDE INTERESTS

As employees, we should avoid investments or other financial interests that could interfere, or appear to interfere, with our ability to make decisions in the best interest of the Company.

We must not:

- Hold a financial or personal interest in any Sadara customer, supplier, distributor or agent if we are in a position to affect Sadara's business relationship with them, unless such interest is by way of passive investments in securities listed on a stock exchange.
- Take any opportunity for business or profit that belongs to Sadara, or compete with the Company in any way.

The annual Conflict of Interest Form that all Sadara employees and contractors are required to complete asks each of us to declare any personal circumstances that may create a conflict of interest. It is important that we respond fully and honestly to the questionnaire; and that we promptly notify our supervisor or the Office of Ethics and Compliance if a situation exists.

## OUTSIDE EMPLOYMENT

In general, we may work outside of Sadara in any lawful occupation as long as these other duties are performed outside of normal working hours, do not interfere with our ability to perform our Sadara job, are not in violation of the Saudi Labor or Residency Law and are not readily perceived to violate the Company policies or the guidelines as set out in this Code. However, pursuant to Saudi Law, non-Saudi employees are prohibited from engaging in any employment relationship, or other profit generating activities, in Saudi Arabia during their employment with the Company.

For avoidance of doubt or potential conflict, any outside business interests, including employee involvement in any family business must be disclosed in the Company Conflict of Interest Form. If you are considering being involved in a new business interest at a time after the annual Conflict of Interest Form has been submitted, you can provide a written supplement thereto, addressed to your immediate supervisor, describing your involvement in the new interest since the filing of your annual Form.

We must not:

- Be employed by, or receive any compensation from a Sadara customer, supplier, distributor or

agent if we are in a position to affect Sadara's business with any of them.

- Be employed by, or receive any compensation from, any competitor of Sadara.
- Serve as an officer or director of any for-profit company or organization outside of Sadara without first disclosing and seeking formal written approval from the Company's Management Committee with endorsement of the Chief Compliance Officer or the Office of Ethics and Compliance.

## SPEAKING AT CONFERENCES

If we are invited to speak at a conference because we are a Sadara employee or because of our expertise arising from our Sadara job responsibilities, we cannot accept compensation. However, in such a situation, the Company can accept reimbursement for reasonable expenses. When in doubt, check with your immediate Supervisor or the Office of Ethics and Compliance.

## RELATIVES, FRIENDS AND PERSONAL RELATIONSHIPS

Many of us have relatives or friends who may have business relationships with Sadara, our customers, suppliers, distributors, agents or competitors. These circumstances can raise conflict of interest questions, because others might think we are favoring these relationships above the interests of the Company.

We must disclose to our supervisor and the Office of Ethics and Compliance any situation in which:

- A relative or close friend has a financial interest in, or works for, a Sadara customer, supplier, distributor or agent if we are in a position to affect Sadara's business with them.
- An immediate family member or close relative is employed by a competitor of Sadara.
- We are put in a position where we directly or indirectly hire, supervise or otherwise have authority over a relative or personal friend.

## GIFTS AND ENTERTAINMENT

Gifts and entertainment are often used to strengthen business relationships, but we should not accept or offer



them if doing so could affect, or appear to affect, impartial decision-making.

Before offering gifts or entertainment to customers or others outside the Company, we should understand the recipient's rules about accepting gifts and entertainment, as well as the Company's policies in giving gifts.

We do not offer or accept gifts or entertainment that could cause embarrassment to the Company, could be construed as a bribe or kickback, or are in exchange for preferential treatment in any business dealing or as influencing any governmental decision or action. In all cases they must be proper, legitimate and legal under applicable law. Common sense will typically provide us with adequate guidance, however, below are some general guidelines which all employees and Suppliers should understand and follow.

#### Guidance Specific to Gifts:

- We never offer or accept gifts in cash or a cash equivalent, such as a gift card.
- We do not offer or accept a gift that has a value which is greater than the value of a promotional item given to all clients or potential clients or which exceeds the sum of five hundred Saudi Riyals (SR500); these values may be subject to review and revision from time to time, as necessary and appropriate.
- We may accept gifts or discounts offered to a large group of employees as part of an agreement between the Company and a customer, supplier, distributor or agent.
- Gifts given in relation to special recognition, service awards, prizes or drawings at business events do not require declaration.
- If offered by Sadara, gifts must qualify as ordinary and customary business expenses in line with the requirements of established Sadara expense approval procedures. No other gifts, entertainment or hospitality offered by Sadara or on its behalf, other than as described above, are allowed.
- Any offer of a gift that is restricted under this policy must be reported, in writing to the Office of Ethics & Compliance (EthicsHotline@sadara.com), and to the employee's immediate Supervisor.

#### Guidance Specific to Entertainment:

- We do not offer or accept entertainment unless it is consistent with customary business practice. For example, occasional business meals or attendance at a theater or sporting events with airline tickets, in or out of Kingdom, with a customer or a supplier are generally acceptable.
- We do not offer or accept entertainment that is offensive, indecent or inconsistent with our values or morals.

In the event gifts or entertainment related to a single occurrence or in the aggregate as a pattern of behavior, whether offered to us or given by us, shall exceed the sum of five hundred Saudi Riyals (SR500); or in the event there is any question or doubt as to the value, propriety or circumstances of any transaction(s) involving gifts or entertainment, you must get written approval from your Manager level supervisor, Business Line head or Sadara's Management Committee, as the circumstances warrant. You may also seek a written opinion from the Office of Ethics and Compliance for specific guidance. See also section on *Bribery & Corruption* in this Code.

If you have additional questions outside the guidance set forth above, contact your supervisor, the Law Department or the Office of Ethics and compliance.

Certain functions and departments of the Company may adopt with the approval of the CEO more restrictive rules relating to the offer or acceptance of gifts

## BRIBERY AND CORRUPTION

We are committed to maintaining the highest ethical and legal standards in our relationships around the world. This includes our relationships with governments and Government Officials as well as with other businesses. We do not participate in bribery or corruption in any form.

#### Who are Government Officials?

- Employees of any government or government-controlled entity anywhere in the world, including low-level administrative officials.
- Political parties and party officials.
- Candidates for political office.
- Employees of public organizations, such as the United Nations.
- Employees of state-owned enterprises.

We must not offer, promise or give anything of value to a Government Official or to anyone else, in order to gain or maintain a business or a business advantage.

Examples of bribes include paying or otherwise compensating a Government Official to:

- Award a contract to the Company.
- Obtain advantageous tax or customs treatment.
- Obtain permits or regulatory approvals.
- Bypass or break laws or regulations applicable to the Company.
- Obtain or provide confidential information related to contractor bidding, selection or awards.

We must not use a third party—such as a subcontractor, consultant or agent—to pay a bribe. The Company and individual employees may be liable if a third party pays a bribe on our behalf, even if we did not direct the payment.

We are equally vigilant to avoid bribery and corruption in transactions with other businesses and private parties.

Similarly, we are strictly prohibited from accepting bribes from others. Employees must never solicit, accept or receive, directly or indirectly, any payment, loan, extension of credit, guarantee, gift, object of any value or any kind of preferential treatment from a third party in exchange for favorable treatment or consideration with regards to a transaction or dealing or engagement (including the procurement of goods or services) of any kind with Sadara. This prohibition extends to all members of our families as well as dependents, and to any third party who may benefit at our direction.

To avoid even the appearance of improper conduct, consult with the Office of Ethics and Compliance before giving anything of value (including gifts, meals, entertainment, and business or employment opportunities) to a Government Official.

## GOVERNMENT OFFICIALS

Interactions with Government Officials are subject to complex legal rules. Most national laws set out severe penalties for bribery and corruption, including large fines and imprisonment. Even simple acts like providing gifts to a Government Official can raise suspicions of corruption.

If you have a concern regarding an interaction you have observed, or communications you have received from

Government Officials, you should discuss your concerns with the Office of Ethics and Compliance.

## BUSINESS AND FINANCIAL RECORDS

Business and financial records are essential to Sadara's success. The integrity and accuracy of these records help internal decision-making and are the basis of our reporting to shareholders, investors, creditors, government agencies and other stakeholders.

We must:

- Keep and present all Company records and reports in accordance with the law and Company policies. These records include accounting records as well as any other electronic or written records, such as expense reports, time sheets, medical claim forms, personnel reviews and the wide variety of analytical, engineering and technical reports.
- Establish and maintain a Company-wide system of strong and effective internal controls.
- Ensure that all Company records accurately and fairly reflect the underlying transaction.
- Never falsify any document.
- Record all financial transactions in the proper account, department and accounting period.
- Ensure that all actions and commitments are in accordance with Sadara's Management Guide - Authorization Policy and Delegation of Authority.
- Validate that all public communications, including reports to government authorities, are full, fair, accurate, timely and understandable.
- Raise any concerns about the accuracy of Sadara records with finance management or through another appropriate channel.
- Maintain the confidentiality of all records and reports.

## USE AND PROTECTION OF COMPANY RESOURCES AND INFORMATION/CONFIDENTIALITY

Sadara resources are intended for business use, and we all have an obligation to protect and use them properly.

As employees we are expected to:

- Use Company funds legally and responsibly.
- Safeguard Sadara resources from theft, waste and carelessness.
- Not use Company funds or other resources to support an outside business or unauthorized activity.

Examples of Company resources include:

- Company funds, credit cards and other accounts
- Computers, electronic networks and other office equipment
- Telephone and mobile communications devices
- Internet access and e-mail
- Supplies
- Company proprietary information
- Automobiles

## INTELLECTUAL PROPERTY

Our continued success and future growth depend upon innovative products and solutions. To achieve a sustained competitive advantage for Sadara businesses, we must protect our intellectual property against theft, misuse and loss. With the support of the Law Department, we all must take appropriate steps to secure intellectual property protection for Sadara inventions, proprietary information, trademarks, trade secrets and copyrighted materials.

This includes:

- Using the Sadara brand and trademarks, including the Sadara logo, in accordance with Company guidelines.
- Reporting to the Law Department any concerns about Sadara intellectual property being infringed, misused or misappropriated.
- Respecting the trade secrets, copyrights, trademarks, patent rights and proprietary information of third parties by avoiding unlawful use or infringement.

## INFORMATION TECHNOLOGY

We rely heavily on computer systems and telecommunications networks. We must protect those systems from misuse. We will:

- Follow the Sadara Information Protection Policies, and Security and Data Protection requirements.
- Use and protect passwords for computer or network access.

- Store sensitive, proprietary or highly confidential information in protected files on secure servers provided by the Company.
- Safeguard all electronic devices at all times.
- Protect information security controls.
- Protect Company equipment or systems from illegal or other offensive or inappropriate purposes.

## THIRD PARTY CONFIDENTIAL INFORMATION

The Company has the contractual obligation to third parties not to disclose and to protect and preserve designated confidential information, secrets and proprietary information given by or otherwise obtained, including copyrighted or patented materials, systems, products, information and ideas. We, as Company employees, are likewise bound by and responsible for preserving the integrity and expectation of the confidentiality of third party's confidential information, and shall exercise all the good care and diligence regarding the use and protection of both third-party and Company resources and information.

As employees, temporary or permanent, of a joint venture company, we may from time to time have access to confidential, sensitive, intellectual property, or copy righted material of one or both shareholder companies. Proper permission must be requested and given from the respective shareholder company prior to extracting, sharing or utilizing information or documents. Consult with Sadara's Law Department for clarification on these items.

## PROPRIETARY INFORMATION AND RECORDS MANAGEMENT

We are all responsible for maintaining the integrity of Sadara information and for using it appropriately. Unauthorized disclosure of Sadara information could harm the Company or give an unfair advantage to others.

This means we;

- Classify documents according to Sadara's policies and procedures.

- Retain and discard Company records consistent with Sadara’s policies, procedures and schedules.
- Follow all special record-keeping requirements issued with respect to internal investigations, litigation and government inquiries.
- Report loss of any Sadara information as soon as reasonably possible.
- Observe all contractual obligations to safeguard others’ information, and do not disclose the proprietary information of others.
- Limit access to sensitive, proprietary or highly confidential information to those who are authorized to access such information.
- Do not discuss Sadara information where the conversation may be overheard or compromised.

If it is necessary to share proprietary information outside the Company, we must first consult our Supervisor to ensure that adequate protections are in place, such as a confidentiality agreement, and to ensure that we can share the document with outside parties. Parties may consult with the Law Department for additional guidance or assistance in this area.

Examples of Sadara proprietary information include, but are not limited to:

- Research and development (R&D) information
- Trade secrets
- Personnel records
- Business plans and proposals
- Capacity and production information
- Marketing or sales forecast and strategies
- Client and customer list
- Pricing lists or strategies
- Supplier data

We must obtain appropriate approval for external presentations that contain Sadara information. Even after we leave Sadara, we have a continuing obligation to protect the Company’s proprietary information.

## SADARA AS A SERVICE PROVIDER OR SUPPLIER

When Sadara is acting as a service provider or supplier, it has an obligation to protect the confidential information of its customers. This “Customer-Confidential Information” should be shared only with authorized Sadara representatives, as designated in the controlling

agreements. Please seek guidance before you disclose any Customer-Confidential Information.

## DATA PRIVACY

Consistent with Sadara’s values, we respect the privacy of individuals and protect their personal data.

- We handle personal data responsibly and in accordance with applicable policies, any contractual obligations and local laws.
- We use personal data only for legitimate business purposes.
- We are open and transparent about the purposes for which we use personal data.
- We protect personal data from unauthorized disclosure.
- We limit disclosure of sensitive personal data to those who are under professional obligations of confidentiality and who are trained in the proper handling of this kind of information.

“Personal data” includes, but is not limited to, any information about another employee that you had access to as a result of your employment with Sadara.

Protection of “personal data” extends to individuals who have been employed by Sadara and are no longer actively engaged; and shall extend to preclude specific information regarding an individual’s performance record and or reasons for separation or termination of the employer/employee relationship.

## INSIDE INFORMATION AND TRADING

Many of us are exposed to information about Sadara—or about companies that Sadara does business with—that may not be known to the public. This nonpublic information may, among other things, relate to business or manufacturing plans, new products or processes, mergers or acquisitions, serious business risks, sales, negotiations or other financial information. Moreover, the information we are exposed to may be fact or may be rumor, fiction or otherwise flawed. In line with the Company’s commitment to the highest standards of ethics, as well as to full compliance with all applicable laws and regulations, including the Saudi Capital Market Law, the Company, when appropriate, will adopt policies and procedures with respect to the trading of the shares of either the Company or of companies Sadara does business with. We do not trade in Company securities, or those of any other company, using material nonpublic information gained through our work at Sadara, nor do we disclose this kind of information to others so that they

may trade. Insider trading is illegal and will not be tolerated.

Material nonpublic information is any information that could affect a reasonable investor's decision to buy, sell or hold the securities of a company. Insider trading rules are complex. When in doubt, consult the Office of Ethics & Compliance or the Law Department. Being an insider does not mean you are completely restricted from trading in the Company's securities. It does mean that you are subject to strict limits on when you can trade in the Company's securities. These restrictions also apply to trading securities of the Company's shareholders, affiliates, Sadara joint venture companies, and any other company in which your work with Sadara has allowed for you to have inside information which is not available to the general public.

## CONTRACT CLAUSE

All Sadara contracts shall include a clause referencing Sadara's ambition to instill a culture of Anti-Bribe and No-Kickback in its workplace and a zero tolerance of such illegal practices among its own employees, its Suppliers and other third parties with whom it does business. Such Contractual clause shall provide, in effect, the following:

*"All Parties to this Agreement do hereby agree to and adhere to a strict 'No Tolerance' policy for Bribes or kickbacks. All Parties agree take reasonable actions and precautions designed to prevent and detect Bribe or kickback. All parties agree to notify the other parties in writing if they have reasonable grounds to believe any violation may have occurred. Furthermore, all parties agree to cooperate fully with any investigation of suspected illicit behavior."*

### **Sadara pledges:**

(a) To take every reasonable effort to prohibit any person from:

(1) Providing, attempting to provide, or offering to provide any bribe or kickback; or

(2) Soliciting, accepting, or attempting to accept any bribe or kickback;

(b) To aggressively pursue criminal penalties against any person who knowingly and willfully engages in such

prohibited conduct when it involves the Company or the Company's assets, employees, contractors, or suppliers.

(c) To aggressively pursue the maximum financial remedies from any person who knowingly engages in such prohibited conduct and from any direct Contractor whose employee, Subcontractor, or Subcontractor Employee provides, accepts, or charges a bribe or kickback.

(d) To require a direct Contractor or Subcontractor to report in writing to the Company any possible violation of this policy when the direct Contractor or Subcontractor has reasonable grounds to believe such violation may have occurred.

(e) To provide that, for the purpose of ascertaining whether there has been a violation of this Policy with respect to any contract, the Office of Ethics and Compliance, in cooperation with any other Sadara organization deemed necessary, shall have access to information and may conduct an investigation, when necessary, of any facility, books and records, including any electronic data or records, of any direct Contractor or Subcontractor under a contract awarded by such agency.

(f) To require each contracting agency to include in each contract for other than commercial items, a requirement that the direct Contractor shall cooperate fully with any Sadara investigation of a possible violation of the policy.

## VOIDING & RESCINDING CONTRACTS

In the event:

(1) There has been a final conviction for bribery or taking a kick-back, conflict of interest, disclosure or receipt of contractor bid or proposal information or source selection information in exchange for a thing of value or to give anyone a competitive advantage in the award of a Company contract, or similar misconduct; or

(2) There has been Company determination that contractor bid or proposal information or source selection information has been disclosed or received in exchange for a thing of value, or for the purpose of obtaining or giving anyone a competitive advantage in the award of a Company procurement contract,

the Company shall have reserved the right to void, rescind or otherwise terminate the contract for cause, and to pursue all legal and criminal remedies afforded to it under the applicable laws of the governing jurisdiction. The authority to approve actions to void and rescind contracts is restricted to the Chief Executive Officer of Sadara.

## COMPETITION

Our responsibility to conduct business ethically extends to our relationships with customers, shareholders, suppliers, competitors and regulators. This means competing within appropriate legal boundaries and on the basis of price, quality and service.

## ANTITRUST AND FAIR TRADE

Sadara is adamant about winning business ethically and obeying all antitrust and trade laws, which demand free and fair competition. We do not have discussions or reach agreements with competitors or others that may restrict open competition in business or fair employment. This includes but is not limited to conversations with competitors about:

- Prices or credit terms.
- Submission of bids or offers.
- Allocation of markets or customers, or division of territories.
- Restrictions on production or distribution.
- Boycotts of suppliers, employee candidates or customers.
- Employee compensation packages

We do not engage in any unfair, misleading or deceptive trade practices. We advertise, promote and label our products and services in a factual, honest and informative way. Sadara adheres to strict compliance of all relevant local and international Competition Laws, Anti-trust and fair trade laws.

All Suppliers, Manufacturers, Contractors, Sub-Contractors, etc. who wish to establish a business relationship with Sadara, will be required to know and abide by the Sadara Supplier Code, as well as sign the Acknowledgement form.

## GATHERING COMPETITIVE INFORMATION

Information about our competitors enables us to better understand market demands and improve our products and services, but we must always gather competitive data legally and ethically. To obtain competitive intelligence, we will use publicly available information, including published articles, market analyses and purchased reports.

- This means we will not seek a competitor's confidential information, or accept anyone else's confidential information, without their consent.
- We will never use illegal or unethical means (e.g., theft, bribery, misrepresentation or espionage) to obtain competitive information.
- We will comply with all applicable laws when gathering competitive information.

## TRADE CONTROLS

We conduct business on an international scale in a world that can be dangerous. To prevent terrorism, halt the proliferation of weapons and fight narcotics trafficking and other crimes, various governments have established trade controls that restrict certain business transactions and the movement of certain goods across national borders.

- We must abide by all trade controls applicable to our business.
- Trade control laws can restrict:
  - Export of certain goods, services and technology.
  - Business dealings (including import, export and investments) with certain countries, entities and individuals.
  - Travel to certain countries.
  - Exchange of information.
- As a joint venture with international partners, we must follow both Saudi Arabian and U.S. export controls, trade restrictions, economic sanctions and anti-boycott laws however they may apply to our business activities, as well as local trade controls wherever we do business.

The laws on this subject are complex and subject to frequent change. The penalties for violating trade control laws can be severe. Consult a Law Department Attorney before engaging in any transaction that may potentially involve products or services subject to export controls, a sanctioned country or a prohibited party

# CITIZENSHIP

Sadara understands it is only a part of the bigger whole. We depend on the community as much as it depends on us. When the community thrives, so do we.

"Social obligation is much bigger than supporting worthy causes. It includes anything that impacts people and the quality of their lives."

~William Ford Jr., Chairman, Ford Motor Co.

---

## SETTING THE STANDARD FOR SUSTAINABILITY

We are all part of a complex system that requires balance, innovation and an uncompromising focus on protecting our planet. Our commitment to each other and to environmental stewardship requires us to ensure that our products, operations and behaviors adhere at all times to applicable governmental standards, Sadara environmental standards and approved compliance plans.

The product safety and environmental laws are complex, are subject to frequent changes and vary from country to country. If you have any questions or concerns, you should seek advice from a Law Department Attorney or an HSES subject matter expert to clarify how these laws apply to your job.

## CORPORATE CITIZENSHIP

We are committed to making positive change through community partnerships, charitable giving and volunteerism. Through our science, expertise, innovation, volunteerism and donations, we are taking bold steps to help solve some of the world's most challenging problems. Through relationships with our neighbors and partners, we are building better, stronger, more sustainable communities in the places where we do business. Our sustainability goals and corporate citizenship initiatives are a source of pride for employees.

- We engage in active dialogue with organizations representing the communities where we do business.
- We support initiatives that address the goals and needs of the community and seek to leverage our capabilities to support those communities.

## CHARITABLE ACTIVITIES AND VOLUNTEERISM

Sadara encourages participation in local, national and international community processes to fulfill our Corporate Social Responsibilities.

- If we express personal views in a public forum (such as a letter to the newspaper), we must not use Company letterhead or Company e-mail, or refer to our business address or title.
- We always comply with all relevant laws regulating Sadara's participation in social or community affairs, including charitable contributions.

Sadara supports both employee and Company participation in a variety of charitable endeavors around the world. That participation can range from financial contributions, contributions of employee time or resources, to donations of Sadara products, services and other resources.

We will:

- Support our personal community activities on our own time, with our own resources and not as a representative of Sadara, except when formally appointed and engaged as a sponsor representative on behalf of Sadara in a Company-sponsored activity or event.
- Obtain authorization for any donation to any charity in Sadara's name.

We will not:

- Represent Sadara in any public process or forum unless specifically requested to do so by management.
- Obtain reimbursement from Sadara for personal expenses or donations to charitable activities.

## COMMUNICATIONS WITH THE PUBLIC

We strive to communicate with the public in an accurate and consistent way. To be sure that we comply with the law and protect our interests, only those who are specifically designated to do so should represent the Company to the public or media.

If we receive an inquiry from an outside contact about a Company matter, we should direct the inquiry to our local Public Affairs representative.

## SOCIAL MEDIA

Social networks and other forms of social media are becoming part of the business mainstream. In general, the rules that apply to new communication tools are consistent with traditional communication rules. Specifically:

**Do:**

- o Clearly distinguish between authorized business communication and personal communication. If you give a personal opinion on public issues, do not create the impression that you represent Sadara or are expressing the views of Sadara.
- o Respect trademark, copyright, fair use, trade secret and financial disclosure laws and Company guidelines.
- o Adhere to Sadara's values in all authorized business communications.

**Don't:**

- o Speak on behalf of Sadara unless you are a designated spokesperson and have permission to do so.
- o Disclose any confidential information belonging to Sadara, its employees, customers, suppliers or other business partners.
- o Refer to Sadara customers, suppliers or business partners without their approval.
- o Endorse Sadara products or services without prior approval.
- o Divulge personal data about others, especially personal data obtained as part of your Sadara relationships.

## ADMINISTRATION OF THE CODE

---

### OFFICE OF ETHICS & COMPLIANCE

The Office of Ethics and Compliance (OEC) is a division in the Sadara Law Department. The OEC works in conjunction with the General Auditor and the Audit Committee of the Board of Directors, Sadara Finance Organizations, Industrial Relations organizations, as well as with Security and Safety Organizations. The OEC was

established by Board of Director's Ethics & Compliance Committee (ECC) and its directive and charter are directly prescribed by the ECC.

## INVESTIGATION AND RESPONSE

The Company takes seriously and fully investigates all potential law or policy violations. The OEC has the responsibility to investigate all complaints or concerns brought to its attention. Relevant subject matter experts conduct the investigations. Investigations are conducted in a way that is respectful, confidential and fair. If the investigator substantiates an allegation, an appropriate management team will review the findings and determine the final outcome.

The Company will protect anyone who raises a concern honestly, but it is a violation of this Code and Company Policy to knowingly make a false accusation, lie to an investigator, or interfere with or refuse to cooperate in an investigation. We are all expected to be truthful and fully cooperate in any investigation.

## ACKNOWLEDGEMENT

We must initially and periodically acknowledge that we have read the Code and agree to abide by the Company policies and the laws which are the basis for the Code . Failure to read or acknowledge the Code does not excuse us from compliance with the Code, our policies or the law.

## WAIVER

The Board of Directors or its designated committee must approve any modification or waiver of a provision of the Code, and the Company will disclose such modifications and waivers publicly as required.



## CONTACTS

Questions or concerns about proper conduct may be addressed with:

- Your Immediate Supervisor or HR Services representative
  
- Office of Ethics & Compliance ([http://sadara.com/en/about/Ethics\\_and\\_Compliance](http://sadara.com/en/about/Ethics_and_Compliance))
  
- Board of Director's Ethics & Compliance Committee members:
  - Jim McIlvenny, [Jmcilvenny@dow.com](mailto:Jmcilvenny@dow.com)
  - Ahmad A. Al-Sa'adi, [Ahmad.Saadi@aramco.com](mailto:Ahmad.Saadi@aramco.com)
  - Peter Holicki, [Phholicki@dow.com](mailto:Phholicki@dow.com)
  - Faisal Al Faqeer [faisal.faqeer@aramco.com](mailto:faisal.faqeer@aramco.com)

Or Contact us by mail:

**SADARA CHEMICAL COMPANY**  
**Office of Ethics and Compliance**  
P.O. Box 11811  
Jubail Industrial City 2  
Jubail 31961, Saudi Arabia

**THE FINAL PIECE OF THE  
PICTURE IS YOU!**

Having a code of conduct, a standard of courage, discipline, determination and integrity makes *this company...*

*Our Company!*

/