

CODE OF ETHICS

For

SENIOR FINANCIAL EMPLOYEES

Of

TRINSEO, S.A.

BASIS AND PURPOSE OF THIS CODE OF ETHICS

Trinseo, S.A. and its subsidiaries (collectively, “Trinseo”) are committed to conducting their business in full compliance with the law and consistent with the highest ethical standards. The ethical conduct, including the honesty, integrity and candor, of the Chief Executive Officer, the Chief Financial Officer, the Treasurer and the principal accounting officer or the Controller of Trinseo and all persons performing similar functions (collectively, the “Senior Financial Employees”), are fundamental to this commitment and to the reputation and success of Trinseo. All employees, officers, directors and agents of Trinseo, including the Senior Financial Employees, are required to adhere to Trinseo’s Code of Business Conduct and Ethics (the “General Conduct Policy”) and its supporting policies covering ethical conduct, conflicts of interest and compliance with law. In addition, the Senior Financial Employees are subject to the specific policies set forth in this Code of Ethics. The integrity and ethical conduct of the Senior Financial Employees are particularly critical to the future of the enterprise. Thus the Board of Directors of Trinseo has adopted, and each of the Senior Financial Employees has subscribed to, this Code of Ethics.

CODE OF ETHICS

All Senior Financial Employees shall, in performing their respective duties:

1. Act with honesty and integrity, and avoid or resolve with appropriate and prompt disclosure to the Board of Directors any actual or apparent conflicts between the Senior Financial Employee’s personal interest and Trinseo’s interest.
2. Act in good faith, with due care, competence and diligence, to provide colleagues with information that is accurate, complete, objective, relevant, timely and understandable. Establish, maintain and support policies and procedures that encourage professional integrity in all aspects of Trinseo’s organization and strive to ensure an environment exists within Trinseo which eliminates inhibitions and barriers to responsible behavior, such as coercion, fear of reprisal or alienation from other employees within Trinseo.
3. Strive to provide or cause to be provided full, fair, accurate, timely and understandable disclosures in all public communications made by Trinseo, and in

- any reports and documents that might be filed with or submitted to the Securities and Exchange Commission and any other governmental body or regulatory agency. Promptly bring to the attention of the Board of Directors and the Audit Committee of Trinseo any material information of which he or she may become aware that affects the disclosures made by Trinseo in its public filings and otherwise assist in fulfilling the responsibilities as specified in Trinseo's policies and procedures regarding financial reporting and disclosure.
4. Strive to identify and rectify any significant deficiencies in the design or operation of internal controls and procedures which could adversely affect Trinseo's ability to timely record, process, summarize and report financial or other required information. Promptly bring to the attention of the Board of Directors and the Audit Committee any information he or she may have concerning (a) significant deficiencies or material weaknesses in the design or operation of internal controls over financial reporting that could adversely affect Trinseo's ability to record, process, summarize and report financial information or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in Trinseo's financial reporting, disclosures or internal controls.
 5. Comply and encourage others to comply with applicable laws, rules and regulations of federal, state, and local governments (both United States and foreign) and other regulatory bodies with authority over Trinseo's conduct and its operations.
 6. Promptly bring to the attention of the Board of Directors and the Audit Committee any information he or she may have concerning evidence of a material violation of any laws, rules or regulations applicable to Trinseo and the operation of its business, by Trinseo or any employee or agent of Trinseo, or of any violation of the General Conduct Policy or of this Code of Ethics.
 7. Maintain the confidentiality of information acquired in the course of employment, particularly including any material non-public information regarding Trinseo or its subsidiaries and their customers and suppliers, and never use such information for personal advantage.
 8. Actively encourage and require the highest standards of ethical and honest behavior by other personnel of Trinseo, including compliance with the General Conduct Policy.
 9. Promptly report to the Board of Directors and the Audit Committee, and actively encourage and require prompt reporting by others of, any information he or she may have concerning any violation of the General Conduct Policy or of this Code of Ethics, including any actual or apparent conflicts of interest between personal and professional relationships, involving any management or other employees who have a significant role in Trinseo's financial reporting, disclosures or internal controls.

Each Senior Financial Employee shall not directly or indirectly take, or cause or permit others to take, any action to fraudulently or improperly influence, coerce, manipulate or mislead Trinseo's independent auditors for the purpose of rendering the financial statements of Trinseo or its subsidiaries false, inaccurate or misleading in their entirety or in any particulars thereof.

The Audit Committee shall investigate or cause to be investigated any alleged violations of this Code of Ethics. The Board of Directors shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of the General Conduct Policy or of this Code of Ethics by a Senior Financial Employee. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the General Conduct Policy and to this Code of Ethics, and shall include written notices to the individual involved that the Board has determined that there has been a violation, and any censure by the Board of Directors, demotion or reassignment of the individual involved, suspension with or without employee benefits, termination of the individual's employment or such other action as the Board of Directors may determine is appropriate under the circumstances. In determining what action is appropriate in a particular case, the Board of Directors or such designee shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violations of the proper course of action and whether or not the individual in question had committed other violations in the past.

Any waiver or amendment of this Code of Ethics may be made only by the Board of Directors or a duly authorized Committee thereof, must be contemporaneously recorded in writing and shall have prospective effect only. All such waivers and amendments shall be disclosed promptly as required by law, rule or regulation.

Each Senior Financial Employee will annually sign an attestation form indicating compliance with this Code of Ethics policy.

Adopted effective as of April 17, 2014