

## **INTERNATIONAL TRADE POLICY**

As a global company with global operations, Trinseo shall conduct its business in accordance with this International Trade Policy (the “Policy”) and in compliance with all international trade laws applicable to its activities. This Policy requires Trinseo to comply with the laws and regulations that restrict its ability to sell goods and technology to certain end-users, for certain end-uses and to certain destinations. The Policy also commits Trinseo to exercise due care in providing information to governmental entities regarding material that it imports or exports. Specifically, as a company with a global operating center and manufacturing facilities in the United States, Trinseo shall not sell goods or technology to companies against whom the United States maintains sanctions and embargoes applicable to the transaction. To assure this, Trinseo shall comply with the United States Export Administration Regulations (“EAR”); International Traffic in Arms Regulations (“ITAR”), sanctions imposed by the Office of Foreign Assets Control (“OFAC”), and the customs laws of the countries where Trinseo imports goods. Please note that the laws and regulations discussed herein are complex and subject to change. Accordingly, this Policy may change depending on the regulations in place at any given time.

**Scope of Policy.** This Policy supports and supplements Trinseo’s Code of Business Conduct, and applies to all of the directors, officers, employees, agents, contractors, advisors and consultants of Trinseo or of any affiliate, wherever located, (“Trinseo’s Personnel”); and to all of Trinseo’s affiliates and subsidiaries (“Affiliates”). This Policy prohibits any activity that directly violates the export control laws of the United States or any other country in which Trinseo does business, as well as any such activity involving any other third party acting on behalf of Trinseo (“Third Parties”).

**Employee’s Responsibility.** Every employee is responsible for adhering to this Policy. As part of that responsibility, employees also have a responsibility to report questionable activity and suspected violations of this Policy, as well as to ask questions if the employee is uncertain of the Policy’s meaning or application in a particular instance. Such reports and questions may be directed to the employee’s supervisory management, to an appropriate member of the Legal Department, to the Chief Compliance Officer, or by means of Trinseo’s Ethics and Compliance Hotline.

**Trinseo Products and Technology.** It is the responsibility of each Trinseo employee involved in the international shipment of Trinseo products, technology or equipment to accurately observe the classification of products under the Commerce Control List or the U.S. Munitions List, as appropriate, and the classification of products under the Harmonized Tariff Schedules. No products, including samples, are to be shipped unless the classification of the product under the Harmonized Tariff System and either the Commerce Control List or the U.S. Munitions List, as appropriate, is determined first and Trinseo’s Export Licensing Procedures are followed.

**Destinations.** Trinseo legally cannot and shall not sell goods or technology for delivery to destinations against which the United States maintains sanctions or embargoes. Trinseo’s Personnel and Affiliates are prohibited from engaging in transactions with destinations against which the United States maintains trade sanctions. Furthermore, Trinseo’s Personnel are prohibited from dealing with persons, corporations or other organizations located in destinations against which the United States maintains sanctions or embargoes.

Currently, the destinations with which Trinseo's Personnel and Affiliates are prohibited from dealing are:

- Cuba
- Crimea, Ukraine (please note that comprehensive sanctions only apply to Crimea, not the rest of the Ukraine)
- Iran
- North Korea
- Sudan
- Syria

This list changes from time to time, and this Policy is immediately and automatically updated to reflect any such changes.

**End Users.** Trinseo's Personnel and Affiliates are prohibited from dealing with any person or organization named on worldwide sanctions lists and must screen all customers and intermediaries to assure that the customer and intermediary are not restricted under any of the following protocols:

- Denied Persons List
- Unverified List
- Specially Designated Nationals List
- Sectoral Sanctions List
- Statutorily Debarred Parties
- Designated Terrorist Organizations
- Missile Proliferators
- Chemical and Biological Weapons Concerns
- Narcotic Traffickers
- UK Proliferator Concerns List
- European Union Sanctions List
- Japanese Proliferator Concerns List

These lists are maintained by governmental units (e.g., the Bureau of Industry and Security of the U.S. Department of Commerce maintains the Denied Persons List online), and are regularly

updated. Entities owned or controlled by listed persons may also be subject to restrictions (e.g. entities owned or controlled by persons listed on the Specially Designated Nationals List) Trinseo should conduct due diligence to determine ownership for potential customers and business partners when there is reason to suspect the entity is owned or controlled by a person listed on a sanctions list. The lists must be observed in any international transactions, and any questions as to the location, content or application of any such list should immediately be raised with the Legal Department or the Chief Compliance Officer. Additional lists may be added based on future developments in international concerns. These lists must be checked prior to Trinseo's commencement of business with new customers, intermediaries, suppliers or vendors, and prior to any shipment to any end user.

**Diversion Risks and Red Flags.** Trinseo's Personnel and Affiliates are prohibited from engaging in transactions in which they have reason to believe that Trinseo products are being diverted to a sanctioned country or to a prohibited end use or end user. Indications of such possible diversion include:

- The customer name, or its address, is similar to one of the parties found on the restricted lists named above.
- The customer or purchasing agent is reluctant to offer information about the end-use (or end-user) of the item.
- The customer has little or no business background. For example, financial information is unavailable from normal commercial sources and corporate principals are unknown by trade sources.
- The customer is willing to pay cash for a very expensive item when the terms of sale would normally call for financing.
- The customer is unfamiliar with the product's performance characteristics but still wants to obtain the product.
- Routine installation, training, or maintenance services are declined by the customer.
- When questioned, the buyer is evasive and unclear about whether the purchased product is for domestic use, for export, or for re-export.
- Customer uses only a "P.O. Box" address or has facilities that appear inappropriate for the items ordered.
- Customer is known to have, or is suspected of having, unauthorized dealings with embargoed destinations.
- Delivery dates are vague, or deliveries are planned for out-of-the-way destinations.
- A freight -forwarding firm is listed as the product's final destination.

- The shipping route is abnormal for the product and destination involved.
- Packaging is inconsistent with the stated method of shipment or destination.

**End Uses.** Trinseo's Personnel and Affiliates are prohibited from selling goods or technology for use in chemical weapons for proliferation activities. Trinseo has an affirmative responsibility to examine situations that suggest that the customer may be using Trinseo products in such activities, or where it appears that the customer does not have the experience or capabilities one would expect of a purchaser of the Trinseo product. Trinseo's Personnel and Affiliates shall further examine or refuse to participate in transactions as indicated by the following inquiries.

- Do the product's capabilities fit the buyer's line of business? For example, a small bakery orders industrial quantities of a chemical.
- Is the item ordered incompatible with the technical level of the country to which it is being shipped, such as a chemical being shipped to a country that has no apparent industrial ability to use it?
- Is there any indication that the item will be used directly or indirectly in:
  - any atomic or nuclear-related activities;
  - any rocket system;
  - any military activity; or
  - the design, development, production, stockpiling, or use of chemical or biological weapons?

**Deemed Exports.** It is a violation of the export control laws and regulations of the United States to disclose controlled information to a foreign national anywhere in the world. Trinseo's Personnel are required to understand these laws and regulations, and to restrict access by foreign nationals, within or outside the Company, accordingly, unless a license is first acquired to release such information.

**Anti-Boycott.** It is a violation of this Policy to comply with an international trade boycott, embargo or discriminatory practice unless such compliance is permitted by United States authorities. A request to participate in a boycott may take the form of requests to refuse to transact business with certain blacklisted companies or countries; to refuse to use certain conveyances; or to guarantee that a Trinseo product contains no content from a specified country. It is unlawful to agree to such provisions even if the provision is inapplicable as a practical matter to the transaction involved. Any request for boycott adherence must immediately be reported through one of the means described above.

**Customs Valuation.** The valuation of merchandise traded internationally is governed by international rules. The price declared upon the importation of merchandise must be the price actually paid or payable for the merchandise, or otherwise supported by the books and records of

the Company reflecting the value of the merchandise. International invoice values may not be arbitrary or fictitious. Intercompany pricing as determined for international tax purposes may not be supportable as a customs value for imported merchandise. The value of merchandise sold across borders must be separately analyzed. All pricing of Trinseo merchandise must follow the Company's established practices and procedures for such matters. It is a violation of this Policy to request that any material, including samples, be valued at an arbitrary price.

**Country of Origin Understanding.** The country of origin of a product is instrumental to understanding the rate of duty applicable to the product, and may impact whether the product may be imported at all. The detailed rules for determining the country of origin of a product may differ depending on the purpose of the origin determination. The Company therefore shall only certify the origin of a product based on a documented and detailed analysis of the applicable rules.

**Antidumping/Countervailing Duties.** Additional duties may be assessed on products that have been determined to injure an industry by virtue of being sold internationally at less than fair value or with the benefit of subsidization. It is a violation of this Policy to fail to report the applicability of antidumping duties to an imported product or to obstruct the determination that a product is subject to antidumping or countervailing duties.

**Use of Customs Brokers and Other Agents.** While there are many agents involved in any international supply chain, the compliance obligations outlined in this Policy belong to Trinseo, its Personnel and Affiliates. The use of an agent does not, and cannot, relieve Trinseo of these obligations.

**Cargo Security.** Trinseo is committed to assuring that its shipments do not serve as a conveyance for weapons of mass destruction. We have developed systems to assure that physical, personnel, information and procedural security is preserved so that Trinseo products and only Trinseo products are contained in our shipments. Trinseo's Personnel and Affiliates are prohibited from shipping any goods in Trinseo shipping containers other than those items specifically ordered and listed on the invoice and packing list. Trinseo's Personnel and Affiliates must assure that all Third Parties adhere to the same Policy.

**Penalties and Discipline.** This Policy recognizes that Trinseo may be subject to criminal and civil penalties for violations of the international trade and export laws recited in this Policy. In addition, individuals who violate international trade and export laws may also be subject to severe criminal and civil penalties, including imprisonment and substantial fines. In such cases, Trinseo will not reimburse any fines or other expenses, including legal expenses. Moreover, Trinseo's Personnel who violate international trade laws or regulations will be subject to discipline, up to and including termination.

**Periodic Risk Assessments.** To the extent the Company commences business in new countries, the Chief Compliance Officer shall, as circumstances may warrant, assess the international trade and export risks of the company's business in the new markets. Based on that assessment, Trinseo shall take appropriate action to assure compliance with all applicable laws and regulations.