

# TRINSEO CODE OF BUSINESS CONDUCT

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## A MESSAGE FROM THE CEO

Trinseo Colleagues:

Trinseo is a new kind of global materials company at the intersection of people, technology and customers. We have a long-standing legacy of unrivalled customer relationships with the world's leading companies, based on our know-how and passion to help them meet any challenge.

Trinseo is committed to conducting business legally and ethically throughout the worldwide Trinseo organization. Trinseo employees are expected to uphold the highest ethical and business standards in all matters involving the Company and to comply with all applicable laws and governmental regulations of the countries in which Trinseo does business.

This Code of Business Conduct (“Code”) lists the Trinseo values, outlines your accountability as a Trinseo employee, and provides key ethical principles and policies to assist you in conducting business around the world. The Code is designed to supplement, not replace, the existing Trinseo policies and standards and the laws and regulations in the countries in which Trinseo does business.

Compliance with the principles in this Code is an obligation for all Trinseo directors, officers and employees. Please take time to read and understand the Code (available at <http://www.styron.com/company/ethics-compliance/index.htm>), apply its principles and policies in the daily performance of your business activities, and immediately report any compliance concerns you may have through any of the channels available to you.

Thank you for your contribution to Trinseo's success.

Chris Pappas  
President and Chief Executive Officer

# TRINSEO CODE OF BUSINESS CONDUCT

## 1. CORE VALUES

Trinseo's\* values are the foundation of this Code, as each value is an integral part of the Company's ethical and business standards. Compliance with this Code, as well as with existing Trinseo policies and standards, is essential for the full realization of Trinseo's values.

Questions, concerns or reports regarding any part of this Code may be raised with your supervisor, Human Resources, or the Chief Compliance Officer. You may make direct contact with one or more of these persons or organizations, or you may use the Ethics and Compliance Hotline, which offers both telephonic and online access, and will permit you to remain anonymous, where legally permissible, if you so choose. The list of Hotline telephone numbers for our various countries is available at <https://secure.ethicspoint.com/domain/media/en/gui/28803/index.html> The webform also can be accessed through this link.

### **Responsible Care**

As a Responsible Care® company, the health and safety of our employees and the protection of our communities are our highest priority. We strive for meeting or exceeding the highest standards of environmental and safety performance.

### **Respect and Integrity**

We treat each other, our customers and our stakeholders with respect and dignity.

We conduct all business activities with the highest ethical standards and are fully committed to comply with the law everywhere we operate.

### **Accountability and Value Creation**

We believe that speed and agility combine with good decision-making to create value. We feel ownership and take accountability for our company's success.

### **Innovation**

We believe that innovation through our technology and the creativity of our people powers our success and the success of our customers.

### **Commitment to Customers**

By collaborating with our customers, we deliver value through our technology, innovation and solutions.

## 2. RESPECT FOR TRINSEO PEOPLE

It is Trinseo's policy to provide all employees with safe working conditions and an environment of respect for the dignity and diversity of all its employees. The principles outlined in this section are considered critical to achieving this goal.

\* Throughout this document, "Trinseo" or the "Company" refers to Trinseo and the Styron affiliated companies to Trinseo. Styron previously announced plans to change the name of all Styron affiliated companies to Trinseo. Some, but not all, of the Styron companies have completed the name change process and are currently known as Trinseo; Styron companies that have not completed this process will continue to do business as Styron until their respective name changes are complete.

If any employee observes or suspects the violation of any of the obligations in this section, he or she should report it to his or her supervisor, Human Resources, or the Chief Compliance Officer, either directly or through the Ethics and Compliance Hotline.

### **Diversity and Equal Opportunity**

Trinseo encourages a culture of mutual respect in which everyone understands and values the similarities and differences among employees, including religious beliefs and practices. Trinseo provides an equal employment opportunity to all employees and will not tolerate discrimination in the administration of any aspects of the employment relationship, including recruitment, hiring, work arrangement, promotion, transfer, salary and benefits, training or termination, all in compliance with applicable laws and regulations. (See the EEO and Anti-Discrimination Policy.)

### **Protection against Harassment**

It is Trinseo's policy to provide all employees with an environment of mutual respect that is free from any form of intimidation, hostility, humiliation or other offensive behaviors that may constitute harassment. Harassment of any sort, including any type of sexual harassment, is strictly prohibited. Regardless of how it is treated under applicable national laws, harassment will always be against the Trinseo Values and is prohibited by this Code. (See the Respect and Responsibility Policy.)

### **Human Rights**

Trinseo believes that respect for the dignity and rights of all employees is critical. Trinseo recognizes and will comply with all labor and employment laws wherever the company does business, and expects the suppliers and contractors with whom we do business to embrace similar values and standards. Trinseo employees shall cooperate to facilitate full compliance in this regard. (See the Labor and Human Rights Policy.)

### **Workplace Health and Safety**

Trinseo's health and safety rules and procedures are designed to provide a safe and healthy work environment consistent with applicable health and safety laws. Maintaining a safe and healthy work environment relies heavily on individual behavior. Every employee must be aware of the rules and procedures that apply to the workplace, diligently follow those rules, and encourage others to do the same. Each employee should immediately report any unsafe situations or conduct (including those described in the following two sections) to the appropriate Trinseo personnel or office, including the employee's manager, Human Resources or the Chief Compliance Officer, either directly or through the Ethics and Compliance Hotline.

### **Substance Abuse in the Workplace**

Trinseo is committed to a working environment free of substance abuse. Such an environment safeguards the health, safety and security of our employees, our operations and all people who come into contact with our workplaces and property. Substance abuse negatively affects productivity, attendance and on-the-job safety. The unlawful use, possession, sale, conveyance, distribution, concealment, transportation or manufacture of illegal drugs, intoxicants, controlled substances or drug paraphernalia on Trinseo premises, in Trinseo vehicles, or while conducting Trinseo business off Company premises is strictly prohibited.

### **Violence in the Workplace**

Trinseo will not tolerate acts or threats of violence, including verbal or physical threats, intimidation, harassment and/or coercion. To preserve employee safety and security, weapons,

firearms, ammunition, explosives and incendiary devices are forbidden on Company premises or in Company vehicles.

### **Protection of Personal Data**

The personal data of Trinseo employees, including an employee's personal identifying information (such as home address, social security number, and personal financial information) must be protected from improper disclosure. Trinseo employees shall not release any personal data without a specific authorization in compliance with applicable laws. Most countries have laws regulating the collection and use of personal data, although the types of data covered, the nature of the protection, and local enforcement mechanisms vary. Trinseo is committed to complying with all applicable laws regarding protection of personal data. All employees are responsible for ensuring compliance with the data privacy requirements under the laws and regulations of the respective countries and under the Company guidelines and/or policies. (See the *Privacy Policy*.)

## **3. PROTECTION OF THE ENVIRONMENT**

### **Goals**

Trinseo's goal is to eliminate all workplace injuries and illnesses, prevent adverse environmental impacts, reduce wastes and emissions, and promote resource conservation at every stage of the life cycle of our products. **Trinseo** conducts business with respect and care for the environment. (See the **Environment, Health and Safety Policy**.)

### **Compliance with EH&S laws**

Compliance with applicable Environmental, Health and Safety (EH&S) laws and regulations, as well as internal EH&S policies and standards, is required. Trinseo expects all employees to be familiar with EH&S laws and regulations, as well as Trinseo EH&S policies, applicable to their area of activity. Whenever needed, Trinseo employees need to seek advice from the EH&S subject matter expert, the appropriate Trinseo legal counsel, or the EH&S Council, as appropriate.

### **Questions and Concerns**

If any employee observes or suspects the violation of these standards, he or she should report to his or her supervisor, Human Resources, the EH&S department (if applicable, the site EH&S leader), or to the Chief Compliance Officer, either directly or through the Ethics and Compliance Hotline.

## **4. PROTECTION OF TRINSEO'S ASSETS & REPUTATION**

Trinseo employees will carry out their professional activity in accordance with ethical standards and in the best interest of the Company. The Company's assets and value must be protected against unethical behavior. This section addresses various types of unethical or illegal behavior that must be avoided. Any violations should be reported to your supervisor, Human Resources, or the Chief Compliance Officer, directly or through the Ethics and Compliance Hotline.

### **Use of Company Resources**

Trinseo resources are primarily intended for business use. All employees, officers and directors should protect Trinseo's assets and ensure their efficient use. Employees may occasionally and in appropriate circumstances use Company resources, such as a copy machine, Internet access,

telephone, or e-mail, for personal purposes. Personal use of Company resources on an occasional and limited basis is acceptable as long as Trinseo's Information Systems Policy and other policies (principally but not limited to section 2 of this Code) are followed, there are no measurable increased costs, and co-workers are not distracted by the use.

### **Confidential Information**

Confidential information includes trade secrets, proprietary know-how, personnel records, business plans and proposals, capacity and production information, marketing or sales forecasts and strategies, client and customer lists, pricing lists or strategies, construction plans, supplier data, business leads, research and development (R&D) information, and any other information not generally known outside Trinseo that has commercial value or involves personal privacy. Confidential information is for Company business use only. Employees, officers and directors should maintain the confidentiality of information entrusted to them by Trinseo or its customers, except when disclosure is authorized or legally mandated. Trinseo employees leaving the Company have a continuing obligation to protect Trinseo confidential information. (See the *Information Handling Policy*.)

### **Records Management**

Records and information are important assets of the Company. They are vital components of our decision-making and operational processes and must be properly managed to obtain and preserve their full value.

All employees are required to be familiar and comply with records management policies and standards applicable to their work. If you have any questions, contact your supervisor or the appropriate Trinseo legal counsel. (See the *Records Management Policy*.)

### **Information Systems**

Computers and all information on Trinseo computers, as well as any Trinseo information on other devices, are Company property. Licensed software or documentation must be used according to licensing agreements.

Each employee must ensure that their use of Trinseo information systems, networks and tools meets Trinseo policies and standards, including information systems policies, security and any local legal requirements. Employees are also responsible for the content of their e-mail messages. Employees must protect passwords that provide access to Company networks, and they should not use their Trinseo title contact information for personal mail, e-mail or anything other than Company business without specific permission from their supervisor. (See the *Information Handling Policy* and *Social Media Policy*.)

### **Gifts, Entertainment and Awards**

#### **Giving or Receiving Gifts or Entertainment**

Trinseo conducts business on the basis of price, quality and overall suitability for business purposes. All our business transactions must be conducted on this basis and be impartial, objective and free of outside influence. Modest gifts, favors and entertainment are often used to strengthen business relationships. However, no gift, favor or entertainment should be given or accepted if it obligates, or could appear to obligate, the recipient, or if it might be perceived as an attempt to influence fair judgment.

Trinseo recognizes that Trinseo's business sometimes requires employees to provide a reasonable amount of meals and entertainment to customers and other persons in connection with Trinseo. All business meals and entertainment must have a clear and appropriate business connection, must be modest and reasonable in nature and amount, and must not be allowed to influence, or appear to influence, any employee's business judgment.

No employee, officer, director, family member, agent or agent's family member should give or receive a gift or entertainment if it:

- Is in cash or cash equivalents
- Is not consistent with customary business practices
- Is significant in value
- Violates any laws or regulations

If you have any questions in this area, you should seek guidance directly from the Chief Compliance Officer or through the Ethics and Compliance Hotline. (See the Gift, Entertainment and Award Policy.)

Gifts to government or political officials may appear to be corrupt, improperly influencing a person or organization for Trinseo's advantage. Anti-corruption laws are often complex, and serious civil or criminal penalties for violations can be imposed on both the Company and the employee responsible, including serious civil or criminal penalties or imprisonment. To avoid even the appearance of improper conduct, employees must obtain approval from a Legal Department or Chief Compliance Officer before giving anything of value (including gifts, meals, entertainment, and business or employment opportunities) to a government official. (See the Anti-Corruption Policy, Conflict of Interests Policy and Gift, Entertainment and Award Policy)

### **Awards**

Trinseo's personnel work as a team, and the accomplishments of Trinseo are the accomplishments of the team and not any one individual. Trinseo's personnel may therefore not accept individual monetary awards from external sources when the basis of such award is related to contributions or activities which draw on the reputation, experience, products or information of Trinseo. Trinseo may from time to time receive awards which Trinseo personnel may accept on behalf of Trinseo in accordance with the Gift, Entertainment and Award Policy. (See the Gift, Entertainment and Award Policy.)

If you have any questions in this area, you should seek guidance from the Chief Compliance Officer or through the Ethics and Compliance Hotline.

### **Conflicts of Interest**

Each Trinseo employee, officer, and director has a responsibility always to work in Trinseo's best interest. A conflict of interest exists when the employee, officer or director, or a family member, friend or other associate has a financial or other interest in a customer, competitor or supplier of the Company which can impact the ability of an employee, officer, or director to act in Trinseo's best interest and make impartial decisions on behalf of Trinseo. (See the *Conflicts of Interest Policy*.)

Trinseo employees, officers, and directors must make a clear distinction between official and private matters and may not exploit their position or relationship with Trinseo to pursue their own personal interests in any business activity. All employees, officers, and directors of Trinseo should avoid any investment, interest, association or activity that may interfere with their ability to

perform job duties objectively and effectively or that may cause others to doubt the Company's fairness and integrity. Also, Trinseo employees, officers, and directors are prohibited from (a) personally taking an opportunity for business or profits that are discovered through the use of corporate property, information or position; (b) using corporate property, information, or position for personal gain; or (c) competing with the Company in any way.

In the event that a conflict or even the appearance of a conflict of interest arises, the employee, officer, or director must inform the Company about the actual or potential conflict and abide by the Company's guidance to resolve it. Thus, in the event of any actual or potential conflict, you must disclose it to your supervisor or the Chief Compliance Officer for instructions on its resolution

### **Government Relations**

Doing business with government agencies is not always the same as doing business with companies. A government's special rules may span many areas of business conduct, such as collecting and tracking costs for products and services, protecting proprietary information, offering and accepting gifts, entertainment or awards, and hiring former government employees. Laws regarding government business are often complex, and serious civil or criminal penalties for violations can be imposed on both the Company and the employee responsible. Any Trinseo employee, agent or contractor whose work involves interaction with any government agency in any country must ensure that their conduct is legal and appropriate. Accordingly, if you are unsure how to work with government officials and government agencies, you should contact the Chief Compliance Officer. (See the Gift, Entertainment and Award Policy, and the Anti-Corruption Policy.)

### **Interactions with the Public**

Every Trinseo employee must separate his personal activities from the work activities performed for Trinseo. When performing community or other charitable activities, or when expressing any personal or political view in a public forum (including any political contributions), the Trinseo employee will not represent, imply any representation of or involve the Company in any manner. (See the *Social Media Policy* and *Charitable Contributions/Donations Strategy Policy*.)

Only those employees whose job responsibilities include communications with the public or media are authorized to represent Trinseo to the public or the media. All other Trinseo employees must avoid purporting to speak for or represent the Company to the public or media. If an employee receives an inquiry, either oral or written, from an outside contact about a Company matter, the employee must direct the inquiry to the appropriate Company spokesperson or any Public Affairs representative. The purpose of this requirement is not to inhibit individual expressions of opinion, but to assure that the Company speaks with one voice and that its message carefully and coherently balances all of its interests and the factors relevant to the issue involved.

### **Political Involvement, Lobbying and Contributions**

Trinseo encourages its employees to contribute to the community and to fully participate in the political process. But Trinseo employees must also comply with the laws governing involvement in political affairs, including laws regulating political contributions and lobbying. No Trinseo employee may engage in lobbying unless such efforts are approved by the appropriate Trinseo officer. Nor may any employee make any political contributions on Trinseo's behalf, or donate to any candidate, political party or campaign, any corporate funds, goods or services, without prior approval by the appropriate Trinseo legal counsel or the Chief Compliance Officer.

## 5. INTEGRITY IN THE MARKETPLACE

Trinseo is committed to conducting its affairs in an ethical manner and pursuant to the highest standard of fundamental honesty and fair dealing. This standard requires adherence to all laws, regulations and normal ethical practices that apply to the Company's business activities.

Trinseo employees are expected to act with integrity in the market place and fully comply with all applicable laws. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Any violation of this obligation or any issues arising with an impact on Trinseo's commitment in this regard should immediately be reported to your supervisor or to the Chief Compliance Officer, either directly or through the Ethics and Compliance Hotline.

### **Competition and Fair Trade**

Trinseo is committed to free, fair and open business competition, and is equally committed to competing ethically and in compliance with laws that foster competition in the marketplace. Most countries have antitrust, competition and trade laws and regulations that demand free and fair competition. These laws must be obeyed. Failure to comply with these laws may lead to criminal proceedings against the individual employees involved and against the company. Accordingly, Trinseo employees must not have discussions or reach agreements or understandings, whether formal or informal, written or unwritten, with competitors, or others, which can restrict free and open competition. (See the *Competition Law Compliance Policy*.)

Trinseo also respects the trade secrets, copyrights, trademarks, and patent rights of others. Unless authorized by the owner, or if the use is an otherwise permitted use under the law, copying of such material would violate this Code and may violate the law.

### **International Trade Laws**

Trinseo's business is global and all Trinseo employees must be aware of basic laws governing international trade. It is illegal, for example, for any employee or any of Trinseo's agents to cooperate with an unsanctioned foreign boycott of certain other countries. Boycott requests typically are contained in documentation for an international transaction and employees should be careful when executing such documentation. Likewise, a number of United States laws restrict the sale of products and technology by Trinseo (generally including its foreign subsidiaries) to businesses or people in certain countries like Iran, Cuba or North Korea. Finally, employees should be careful to determine that the goods being shipped are not subject to specific international controls or restrictions and that the end-user of the goods is not sanctioned by the United States.

Accordingly, Trinseo's global business must comply with the export control laws of the United States and of all of the countries in which Trinseo does business. In addition, customs rules apply to transactions between Trinseo and its affiliates, joint ventures and subsidiaries as well as its customers. Because the laws regulating international trade are complex and frequently confusing, employees who are engaged in international business transactions are responsible for seeking specific advice from the appropriate Trinseo legal counsel or the Chief Compliance Officer, and for being familiar with the Company policies regulating international trade. (See the *International Trade Policy*.)

## **Inside Information**

Sometimes, employees have information about Trinseo, its owners, or about a company with which Trinseo does business, that is not known to the investing public. If such inside information is material—that is, if a reasonable investor would consider the fact significant in reaching an investment decision—then the individual should not buy or sell securities in any company about which they have such information, gained as a result of their Trinseo work or otherwise, nor provide such inside information to others. These prohibitions remain in effect until the information becomes public. (See the *Insider Trading Policy*.)

## **Gathering Competitive Information**

To obtain competitive information about products, services, and prices, Trinseo uses publicly available information including published articles, market analyses, and reports. Trinseo employees should not seek a competitor's confidential information, or accept anyone's confidential information, without the owner's consent. In no case will Trinseo use illegal means (including but not limited to theft, bribery, misrepresentation or espionage through electronic devices) or unethical means to obtain competitive information. Accordingly, Trinseo expects its employees, officers and directors not to attempt to obtain or to use any such information gathered by these or similar means. Again, if you have any questions in this regard, ask your supervisor or the Chief Compliance Officer, either directly or through the Ethics and Compliance Hotline. (See the *Competitive Information Policy*.)

## **Prohibition on Questionable Payments**

Trinseo strictly forbids, and its employees must not make, any unlawful, improper or other kinds of questionable payments to customers, government employees or officials, or other parties. We do business and sell our products on the merits of price, quality and service.

Trinseo employees must comply with all applicable laws, regulations and other legal requirements in offering or providing any gifts, entertainment or any other items of value to customers, suppliers or others. In particular and most specifically, Trinseo employees must not offer a bribe, or any element of or opportunity for personal gain, to any public officials, either directly or indirectly or through any third parties. (See the Gift, Entertainment and Award Policy and the Anti-Corruption Policy.)

Any dealings with public officials, in any country, must be in compliance with the many, highly-restrictive laws governing such contacts, including the U.S. Foreign Corrupt Practices Act; the United Nations Convention Against Corruption; the Organisation for Economic Co-operation and Development (OECD) Convention on Combating the Bribery of Public Officials; the United Kingdom Bribery Act; China's Anti-Unfair Competition Law, as well as its Provisional Regulations on Prohibition of Commercial Bribery Actions; and Brazil's lei Anticorrupção or Law #12.846; along with any legal requirements of any other nations.

Violation of any of these many legal requirements could result in serious consequences for both the employee involved and Trinseo, up to and including dismissal from employment and possibly even criminal prosecution. Therefore, if you have any question whatsoever as to the propriety of any dealing with a government or other public official, you should immediately discuss it with your supervisor or contact the Chief Compliance Officer. (See the *Anti-Corruption Compliance Policy*)

## 6. FINANCIAL INTEGRITY

### **Complete and Accurate Records**

The Company relies on accounting records to produce reports for its board of directors, management, shareholders, creditors, governmental agencies and others. All Company accounting records, and reports produced from those records, must be kept and presented according to the laws of each applicable jurisdiction. Moreover, the records must accurately and fairly reflect the Company's assets, liabilities, revenues and expenses. All actions and commitments must be taken or made according to the Company's Authorization Policy and written delegations of authority.

Each Trinseo employee must therefore ensure that no false or intentionally misleading entries are made in the Company's records. Intentional misclassification of transactions regarding accounts, departments, or accounting periods violate this Code and may violate the law. All transactions must be supported by accurate documentation in reasonable detail, recorded in the proper account and in the proper accounting period.

### **Compliance with GAAP**

Compliance with Generally Accepted Accounting Principles (GAAP) and the Company's system of internal controls is required at all times. Proper justification is required when alternative accounting treatment is possible under GAAP. All employees are expected to demonstrate financial integrity in processing travel and expense reports and other financial transactions. Cash or other assets must not be maintained in any unrecorded or "off-the-books" fund for any purpose.

### **Anti-Money Laundering**

Money laundering is the process of taking the proceeds of criminal activity and making them appear legal. Money laundering can facilitate crimes, such as fraud, drug trafficking and terrorism; it adversely impacts the global economy; and it is strictly illegal. Any Trinseo employee who engages or assists in money laundering is subject to substantial penalties. Employees are expected to be alert to and promptly report any unusual or potentially suspicious activities that could constitute money laundering to your supervisor or any appropriate member of the legal department.

### **Questions and Concerns**

If you have any concerns or complaints regarding questionable accounting, auditing or other financial records, you are expected to report them to your supervisor or the Chief Compliance Officer, either directly or through the Ethics and Compliance Hotline.

## 7. REPORTING CONCERNS

### **Reporting Suspected Violations**

As stated above, if you observe or suspect a violation of the law, this Code or any Trinseo policy, you should immediately report it to your supervisor (or another supervisor or functional leader, if you believe that to be appropriate in the circumstances), or to the Chief Compliance Officer, either directly, or through the Ethics and Compliance Hotline. In any case, Trinseo expects you to seek advice when you have a question, and to recognize actual or potential problems.

Reports of suspected violations will be reviewed and investigated as appropriate by Trinseo's compliance personnel, using outside resources if needed, and you will be notified of the resolution of the issue or problem raised.

Reports of every kind will be handled as discreetly and confidentially as possible. Wherever necessary, reports, investigations and resolutions will be reviewed by Trinseo's senior management and the Audit Committee of the Board of Directors.

While respecting the privacy of our employees as individuals, we must thoroughly and carefully investigate any reports of behavior that may violate the law or Trinseo's values, policies, or standards, damage the reputation of Trinseo, or impact safety. All employees are required to fully cooperate with any such investigation.

In light of the serious nature of reports under this Code or other Trinseo policies and our response to them, it is critical that each report be made in good faith and with integrity. It would be a violation of this Code for an employee to make a report of a breach of the Code or other misconduct which he or she knows to be untrue or misleading.

### **Non-Retaliation Policy**

In support of the Code and our employees' compliance with their legal and ethical obligations, Trinseo has zero tolerance for any reprisal or retaliation against a person who reports a known or suspected violation of any such obligation. Trinseo will take disciplinary action, up to and including termination of employment, against any employee involved in threatened, attempted or actual retaliation. (See the *Whistleblower Policy*.)

### **Questions**

Questions, concerns or reports regarding any part of this Code, the policies and standards of the Company, or laws or regulations of the countries in which Trinseo does business should be raised with your supervisor, Human Resources, or the Chief Compliance Officer.

You may make direct contact with one or more of these persons or organizations, or you may use the Ethics and Compliance Hotline, which offers both telephone and web form access, and will permit you to remain anonymous where legally permissible, if you so choose. The webform and the list of Hotline telephone numbers for various countries are available at <http://styron.intranet.styron.com/gov/default.htm>

# **ANTI-CORRUPTION POLICY**

This Anti-Corruption Policy (the “Policy”) sets forth the commitment of Trinseo\* to conduct all of its business honestly, ethically, without resort to bribery or questionable inducements to do business of any kind, and in compliance with all anti-corruption laws that apply to Trinseo throughout the world. Accordingly, this Policy prohibits Trinseo or any person or entity associated with it, including any joint ventures in which it may participate, from paying, offering or receiving, in any form, any bribe, kickback or other illicit payment or benefit. This Policy reflects Trinseo’s commitment to compliance with the U.S. Foreign Corrupt Practices Act (“FCPA”), the Organisation for Economic Co-operation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials, the U.N. Convention Against Corruption, the Company Law of China and the Supplementary Provisions Regarding Crimes of Corruption and Bribery, and the anti-corruption laws of any other nation in which Trinseo does business.

This Policy requires all of Trinseo’s directors, officers, employees, agents, contractors, consultants, and all persons or entities associated with or representing Trinseo in any capacity (“Trinseo’s Personnel”), to comply with such laws, and all of the requirements of this Policy apply to each of Trinseo’s Personnel. Thus, this Policy strictly prohibits not only those illicit or corrupt payments, as defined by those laws, which are made directly, but also any indirect payments through any of the foregoing persons or entities.

## **Responsibility of Trinseo’s Personnel**

Every member of Trinseo’s Personnel, whether a natural person or legal entity, is individually responsible for adhering to this Policy. As part of that responsibility, employees have a responsibility to immediately report any questionable activity or suspected violations of this Policy to their supervisory management, a Human Resources representative, directly to Trinseo’s Chief Compliance Officer, or by means of Trinseo’s Ethics and Compliance Hotline.

## **Basic Requirements of Compliance with This Policy and Anti-Corruption Laws**

- 1. Corrupt Payments to Government or Political Officials Prohibited.** Trinseo and Trinseo’s Personnel are prohibited from corruptly paying, authorizing, offering to pay or giving anything of value to any government official (as defined in the anti-corruption laws) or to any political party or party official, or any candidate for political office, to obtain or retain business, direct business to any person or gain any other improper business advantage or any other improper advantage in any form for Trinseo, Trinseo’s Personnel or any other party. This prohibition covers any form of payment, including but not limited to bribes, kickbacks or discounts, and any benefit or thing of value, including but not limited to money, reimbursement or gift of any kind.
- 2. Corruption Determined by Purpose of Payments.** This Policy and anti-corruption laws prohibit making or offering any payment or the provision of anything of value where the purpose is to:

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1. influence a government or political official's decision to award a contract or other business opportunity to Trinseo;
2. influence a decision by any such person to issue any government authorization or documentation, such as any approval, permit or license;
3. influence a decision by any such person to relieve Trinseo of otherwise required government obligations, such as paying taxes, passing inspections or obtaining required permits;
4. influence the passage or content of legislation, or the conduct or outcome of any judicial or regulatory proceeding.

Nor may Trinseo's Personnel or Third Parties accept or receive any bribe, kickback, or illicit payment or benefit of any kind, from any customer, supplier or any other person or entity that has any business relationship with Trinseo.

3. **Accurate Books and Records.** It is required by this Policy and anti-corruption laws that Trinseo make and keep accurate books and records, in reasonable detail, and devise and maintain a reasonable system of internal controls. Although this requirement applies to all corporate transactions, Trinseo's Personnel must take special care to ensure that any expenditure of Company funds related to any government or political official is accurately and completely documented, regardless of the amount of such transaction.
4. **Broad Definition of Government Officials.** For the purposes of this Policy, and under the anti-corruption laws, the definition of a government official is broad and includes:
  1. any officer or employee of any government or government department or agency, at any level of government, whether national, regional or local;
  2. any officer or employee of any commercial enterprise that is owned or controlled by a government;
  3. any officer or employee of any public international organization, such as the International Monetary Fund, the European Union or the World Bank; or
  4. any person acting in an official capacity for any government, agency, enterprise, or organization, identified above.
5. **Broad Definition of Political Officials.** In addition to government officials, this Policy and some anti-corruption laws also cover political officials, the definition of whom is also broad and includes:
  1. officers, employees or representatives of a political party or political organization;
  2. candidates for election or appointment to public office or their representatives; and
  3. candidates for election or appointment as an officer of a political party or other political organization.

## **Applicability to Joint Ventures and Other Entities Associated with Trinseo**

- A. As indicated above, this Policy applies not only to Trinseo but also to joint ventures in which Trinseo may participate and to any other entities that are associated with Trinseo in the conduct of its business, in any area across the globe. Consistent with the anti-corruption laws, this Policy prohibits corrupt activities by and through joint ventures, partnerships or any other entities and/or natural persons who may be or become associated with Trinseo in the conduct of its business. Trinseo shall take all reasonable precautions to ensure that such entities and persons comply with this Policy and the anti-corruption laws, including through the exercise of due care in selecting joint venturers, business partners, agents, advisors, consultants, contractors and representatives of any type. Trinseo shall exercise due care to ensure that any such entities and persons are honest, ethical, reputable and qualified for their roles, duties and responsibilities. Trinseo shall also carefully monitor the actions and conduct of all such entities and persons, once selected. Under no circumstances may any member of Trinseo's Personnel ignore or disregard indications that any such entity or person may be violating this Policy or any anti-corruption law, and each member of Trinseo's Personnel has a responsibility to report such activity immediately, through one of the means set forth above.
- B. Relationships between Trinseo and any member of Trinseo's Personnel with any other entities or persons who may have contact with government or political officials must be embodied in a written document. That document must include appropriate anti-corruption provisions that expressly prohibit any actions or conduct that would violate this Policy or any applicable anti-corruption law; and permit Trinseo to terminate the relationship if we believe that violations of this Policy or an applicable anti-corruption law have occurred or may occur.
- C. Any joint venture or other business arrangement in which Trinseo has a controlling interest must participate in Trinseo's Ethics and Compliance program, including this Policy. In arrangements where Trinseo has less than a controlling interest, Trinseo shall use its best good faith efforts to cause the entity or person involved to comply with this Policy or a substantial equivalent hereof, to maintain accurate books and records and an appropriate system of internal accounting controls, and otherwise to comply with any applicable anti-corruption law. In any such arrangements, Trinseo shall reserve the right to terminate its participation if it considers it necessary or appropriate to do so, in its sole discretion, to avoid a violating this Policy or an applicable anti-corruption law.
- D. If Trinseo engages in the acquisition activity, the due diligence process associated with the proposed acquisition shall include a review of the entity's compliance with applicable anti-corruption laws and its ability to comply with this Policy. After completion of an acquisition, the Company shall conduct a thorough review of the acquired entity's anti-corruption compliance posture and implement any appropriate compliance measures.

## **Payments That May Be Permitted in Particular Circumstances**

*Anticorruption laws under various global laws and in different jurisdictions may have differing positions on the types of permissible payments to government or political officials or entities. Accordingly, none of the following types of payments may be made without the advance approval*

*of the Chief Compliance Officer or Legal Department, and the Chief Compliance Officer or legal department should be consulted immediately if any such payment is considered or proposed.*

The FCPA and other anti-corruption laws may permit certain payments to government or political officials or entities in certain limited circumstances, including the following:

- A. Payments that are explicitly lawful under the written laws and/or regulations of the nation in which the official or entity is located and in which the payment is to be made.
- B. Payments that constitute a reasonable and bona fide expense incurred by or on behalf of a government or political official that are directly related to the promotion, demonstration or explanation of products or services, or directly related to the execution or performance of a contract with a government entity. “Reasonable and bona fide expenses” do not include expenses that are lavish or unrelated to legitimate business purposes.
- C. Small, customary payments made to low-level government or political officials to obtain or facilitate a routine, non-discretionary governmental action. A governmental action is routine if it is ordinarily and commonly performed by a government official and does not involve the exercise of the official’s discretion or judgment. In particular, a routine governmental action does not include any decision by a government official to avoid taking action or to award new business or to continue business with Trinseo or Trinseo’s Personnel, or to provide Trinseo or Trinseo’s Personnel a competitive advantage, such as moving the request for a license application ahead of competitors.

*Again, none of the foregoing types of payments may be made without the advance approval of the Legal Department or the Chief Compliance Officer.*

#### Hospitality, Entertainment and Other Gifts

- A. Hospitality, entertainment and other similar gifts shall not be given, directly or indirectly, to government or political officials to improperly obtain, influence or reward an official act or decision, or as an actual or intended quid pro quo for any benefit to Trinseo or any member of Trinseo’s Personnel.
- B. Hospitality, entertainment and any similar gifts promised, offered or provided on behalf of Trinseo or any member of Trinseo’s Personnel to a government or political official must be reasonable in type and amount, in accordance with customary courtesies in the geographic and business areas involved, related to a legitimate business purpose, and lawful under any applicable anti-corruption laws.
- C. Except for reasonable meals, no payment or promise of payment for hospitality, entertainment or any similar gifts to any government or political official may be made by or on behalf of Trinseo or Trinseo’s Personnel on the basis that it is permitted as provided above unless such payment or promise has been approved in advance by an appropriate member of the Legal Department or by the Chief Compliance Officer.

## **Political Contributions and Charitable Donations**

Political contributions of Trinseo or Trinseo’s Personnel funds to government or political officials, and charitable donations by Trinseo or Trinseo’s Personnel, must be consistent with both applicable laws in each of the jurisdictions involved and with the requirements of this Policy. In

addition, Trinseo maintains other corporate policies governing both the Company's political contributions and its charitable donations, and any such payments or gifts by Trinseo or Trinseo's Personnel for either of these purposes must also adhere to those policies.

## **Penalties and Discipline**

Trinseo and Trinseo's Personnel may be subject to serious criminal and civil penalties for violations of the anti-corruption laws. Specifically, Trinseo could be subject to substantial fines and damage awards; and individuals who violate an anti-corruption law may also be subject to substantial fines, which would not be reimbursed by Trinseo, and even imprisonment. In addition, members of Trinseo's Personnel who violate an anti-corruption law will be subject to discipline, up to and including termination of employment.

## **Compliance in New Jurisdictions**

If Trinseo commences business in additional nations or other new anti-corruption jurisdictions, the Chief Compliance Officer shall assess the anti-corruption law requirements of such areas and advise Trinseo's Personnel with regard to compliance with those requirements. The Chief Compliance Officer shall also monitor the conduct of Trinseo's business in such new jurisdictions, and take whatever action may be necessary and appropriate to assure that Trinseo and Trinseo's Personnel comply with the anti-corruption laws of such new jurisdictions and with this Policy.

# **ANTI-DISCRIMINATION POLICY**

Trinseo\* is committed to creating and maintaining an environment in which all Trinseo people have an equal opportunity to reach their potential and contribute fully to the success of Trinseo. All Trinseo employees can expect to work in a professional environment free from discrimination and are expected to fully comply with the requirements of this Anti-Discrimination Policy (the “Policy”). This Policy applies globally to all employees of Trinseo.

## **Equal Employment Opportunity (EEO) Policy Statement**

The policy of Trinseo is to continue to be an equal opportunity employer. It remains our policy to recruit, hire, develop and promote qualified applicants or employees without regard to race, color, religion, national origin, gender, sex, age, veteran status, sexual orientation, gender identity, or mental or physical disability.

## **Discrimination Prohibited**

Trinseo does not tolerate actions, including acts of harassment or reprisal, that are taken based upon an individual’s or a group of individuals’ membership in a protected classification and that adversely affect the terms, opportunities, benefits, working conditions or privileges of employment of that individual or group of individuals. Trinseo will also not tolerate retaliation of any sort against a person who, in good faith, either reports or participates in any investigation regarding any such discrimination or harassment. Violations of this Policy will be addressed with corrective action, appropriate under the circumstances, and individuals found to have violated this Policy may be subject to disciplinary action, up to and including immediate termination of employment.

People Leaders should monitor employment-related activities to assess whether those employment-related activities are in compliance with this Policy.

## **U.S. Federal Legislative Protection**

The following U.S. federal laws, among others, provide protection for employees:

- Employee Polygraph Protection Act
- Fair Labor Standards Act
- Family and Medical Leave Act (FMLA)
- Civil Rights Acts

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Trinseo is committed to complying with all applicable laws and regulations applicable to discrimination in the employment relationship. If you have any questions or concerns as to the applicability or effect of such laws or regulations you should contact Human Resources or the Chief Compliance Officer, which you may do directly or through the Compliance Hotline.

## **Reporting a Problem**

Complaints or concerns should be reported immediately to your supervisor, Human Resources, or the Trinseo Chief Compliance Officer, either directly or through the Compliance Hotline. Complaints will receive prompt, appropriate, and confidential review and investigation. Employees are expected to cooperate if they are involved in the investigation process and to maintain appropriate confidentiality about matters being investigated.

# **CHARITABLE CONTRIBUTIONS/ DONATIONS** **STRATEGY AND POLICY**

## **Charitable Contributions/Donations Strategy**

Charitable giving contributes to **Trinseo's**<sup>\*</sup> strategic objectives of retaining high community acceptance for its operations and promoting Trinseo's reputation with stakeholders such as neighbors, community leaders, local government officials, employees and potential new hires.

As an industrial neighbor operating manufacturing facilities around the world, Trinseo wants to play an active role in the community and encourage our employees to do the same. As part of this commitment, Trinseo has a Global Contributions Program that outlines when and how Trinseo will make contributions and donations – either directly to non-profit organizations or through employee volunteerism.

### **Program Objectives:**

The objectives of Trinseo's Global Contributions Program are as follows:

1. Support Trinseo's commitment to be a responsible company and a good neighbor, and maintain Trinseo's license to operate through support of communities.
2. Increase employee engagement :
  - to enhance employee satisfaction and pride;
  - as a positive factor in attracting and recruiting top talent.
3. Build Trinseo's brand and reputation, and strengthen relationships with targeted stakeholders.
4. Support business growth and advocacy objectives to address issues.

### **Scope and Boundaries**

1. Trinseo will focus its charitable donations at sites where:
  - Trinseo is the sole presence, or has a highly visible presence, or Trinseo is the operator of the site and Dow is a tenant; and
  - there is a strategic need for donations/community relations – such as neighbor relations, community relationship building, etc.

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2. At sites where Dow is the large presence and Trinseo is a small tenant, Dow will take the lead on charitable donations. Trinseo will not allocate donation funds to these sites unless there is a Trinseo-specific reputational issue/concern at the site.
  - Focus in Midland is demonstrating presence to Dow;
  - Minimal visibility in Philadelphia, as it does not have chemical operations.
3. Consistent with Trinseo's strategy and focus, the company will NOT have the following programs:
  - Individual matching donations;
  - Community grants program;
  - Corporate reputation donations program or a corporate signature program.

## **Funding**

Charitable gift opportunities should be prioritized to meet needs identified through community assessment, in proportion to the site's profile in the community and funded from a site's operating budget.

All donation activity must fit Trinseo's affordability model. Trinseo does not have a foundation or a central cost center for donations. All site donations must be funded from the site's cost centers, and all business-driven donations must be funded through business cost centers.

## **Giving Themes:**

Wherever possible, donations should be tied to the following themes:

1. Positive contributions to local economy and community development;
2. Science education and environmental stewardship;
3. Workplace and community safety.

## **Donation Criteria**

1. Contributions will meet tax requirements for the geographic location where the contribution is made.
2. The recipient of any contribution will be either a U.S. 501 (C)(3) or equivalent, qualified, charitable organization
3. The recipient of a contribution may not be:
  - Individuals;
  - Civic leagues, social and sports clubs, labor unions, and chambers of commerce ;

- Foreign organizations that are not equivalents to U.S. 501(C)(3) organizations;
  - Groups that are run for personal profit;
  - Groups whose primary purpose is to lobby for law changes;
  - Homeowner associations;
  - Political Groups or candidates for public office;
  - Religious organization for the sole benefit of the religious organization (company policy);
  - Political organization (non deductible under U.S. tax law) – see political business rules;
  - Pro-card VISA payments to a non-profit organization ;
  - Candidate for elective office;
  - Products bought for non-profit instead of a cash contribution;
  - Travel expenses, meals, and advertising – **if** the event is mixed, that is meals and a contribution, the expense needs to be separated;
  - Dues and memberships;
  - Lobbying expenses;
  - Operating expenses.
4. Contributions may not be in the form of travel expenses, meals, dues, or memberships.
  5. Preference should be given to opportunities brought forward by employees and to recipient organizations where employees volunteer.
  6. Preference should be given to opportunities that create lasting, substantial improvements in communities where the Company has a strategic presence.
  7. Preference should be given to opportunities that generate significant goodwill for the Trinseo Company brand and reputation.
  8. Generally, the same recipient organization should not receive a contribution more than once every few years to ensure independence and diversity. Multi-year gifts for a single significant community project are an exception, and require approval of the Trinseo Vice President of Public Affairs.
  9. Generally, an organization should demonstrate its ability to raise the full funds needed to complete a project before receiving a gift from Trinseo.

10. Generally, a donation from Trinseo should be used to support a project of a recipient organization, i.e., an initiative with a definitive start and finish, and not to fund its ongoing operating expense.

## **Program Elements**

Trinseo's Global Contributions Program is designed to eventually have three program elements:

### **Regional/Site:**

- Donations at local sites for community relations purposes.
- United Way campaign corporate donations (U.S. only, as funding availability allows).

### **Business:**

Customer-driven donations for relationship building.

- Public policy-driven donations (complement but not duplicate trade associations).
- Gifts in kind – product and equipment donations.

### **Corporate:**

- Company-wide Community Day (not active in 2010, revisit in 2011).
- Emergency disaster relief for locations with a strong Trinseo connection (not currently active; would require Trinseo ELT or Board approval for funding).

## **Requirements and Business Rules for Processing Contributions**

A business rules document has been developed to define the work process, documentation requirements and roles related to approving and processing donations. This is available from Trinseo Public Affairs.

Trinseo policy requires that all donations/charitable contributions be approved by the Vice President of Public Affairs, using the form available from Trinseo Public Affairs.

## **COMPETITION LAW COMPLIANCE POLICY**

The Competition Law Compliance Policy (the “Policy”) of Trinseo\* is to fully and faithfully observe all antitrust and competition laws that apply to the Company’s business throughout the world. In particular, and in concert with those laws, this Policy strictly requires all Trinseo’s Personnel to avoid agreeing with a competitor to set prices, allocate customers or geographic territories, illegally monopolize a market, or jointly boycott a supplier or customer. This Policy expressly applies to any Trinseo director, officer, employee, agent, contractor, consultant or other representative (“Trinseo’s Personnel”) and prohibits each such person from engaging in any of the conduct described above or in any other anticompetitive activity. This Policy also applies to all Trinseo companies and joint ventures, wherever they may operate, and includes the competition laws of all applicable jurisdictions.

1. **Responsibility of Trinseo’s Personnel.** Every member of Trinseo’s Personnel is individually responsible for adherence to this Policy. Every member of Trinseo’s Personnel also has a responsibility to report questionable activity or suspected competition law violations, and may do so to their supervisory management, to a Human Resources representative, directly to Trinseo’s Chief Compliance Officer, or by means of Trinseo’s Ethics and Compliance Hotline.
2. **Knowledge of Basic Competition Law Requirements.** All of Trinseo’s Personnel are expected to have a basic knowledge of the principal competition law requirements and to raise questions for legal review in areas of uncertainty. This Policy sets forth below a description of certain conduct that is prohibited by competition laws, and which Trinseo’s Personnel are expected to know and understand. Despite such basic knowledge and understanding, however, specific legal advice on particular actions or proposals will undoubtedly be needed from time to time.

*Thus, if you have any question regarding the application of competition laws to a particular activity of the Company, you must immediately consult the Chief Compliance Officer or an appropriate member of the Legal Department.*

Trinseo’s Personnel must be aware of the following types of conduct that are prohibited by most nations’ competition laws:

1. **Agreements Among Competitors.** Trinseo’s Personnel are prohibited from entering into any agreement with competitors on the following matters:
  - prices charged their customers, including maximum, minimum or stabilized prices;
  - other price-related terms, including discounts, credit terms, terms of sale and transportation costs;
  - bids in competitive bidding situations, including complementary bids in which one party agrees to submit an unreasonably high bid or an otherwise unacceptable bid;

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- output volumes or production capacities, including whether to close or add capacity or limit output to drive up prices;
  - territories where either company will sell or not sell;
  - customers to whom either company will sell or not sell; and refusals to deal with certain customers, suppliers or other competitors.
2. **Communications with Competitors.** Communications with competitors must be carefully considered and must be limited to only lawful, defined business purposes. Memoranda or email messages regarding meetings with a competitor must be carefully written to accurately and completely document what transpired. Failure to clearly record a conversation with a competitor can be misinterpreted later and may suggest that there was an anticompetitive purpose for the discussion. Except in the context of a lawful customer or supplier relationship, as discussed below, Trinseo's Personnel must not discuss with competitors past, present, or future sales prices, pricing policies, bids, discounts, promotions, terms or conditions of sale, customers, territorial markets, costs, inventories, product plans, market surveys, production or production costs.
  3. **Business Relations with Competitors.** Because it is not unlawful for competitors to buy products from or sell products to each other, Trinseo's Personnel may discuss with other parties those topics that are essential to the purchase or supply arrangement, as long as such discussions are focused on the transaction involved and do not stray into prohibited topics, as described above. In the course of negotiating and performing agreements to buy from or sell to its competitors, Trinseo legitimately may disclose to these competitors the information regarding prices, costs, production and other matters that are necessary to the particular transaction involved. However, the information exchanged must be solely for the purpose of negotiating or performing that specific agreement and must be limited to only such information as is necessary for that purpose.

If you have any question about the appropriateness or permissible content of any discussion with a competitor in a supplier- or customer-related context, seek legal advice before proceeding. That will protect both you and the Company, and allow you to negotiate the transaction without the prospect of adverse legal consequences at a later date.

4. **Monopolization.** Although Trinseo is allowed to compete vigorously and to enjoy the success of its business strategy and efforts, it must not obtain or maintain a monopoly or a dominant market position by anticompetitive means. Some of the major examples of conduct that may constitute such anticompetitive means include:
  - tying the sale of one product or service to the purchase or sale of another product or service;
  - pricing below cost (the appropriate measure of cost may vary based on the particular situation);
  - refusing to deal with a customer, supplier or distributor if such refusal will materially injure the other party's ability to do business; and

- an activity designed to drive a competitor out of business or prevent potential competitors from entering a market.

Any proposal that involves any element of the foregoing conduct should be presented to the Chief Compliance Officer or an appropriate member of the Legal Department for advance review.

5. **Relationships with Customers and Suppliers.** Generally, Trinseo may not restrain a customer's or a supplier's ability to compete in a way that would cause injury to competition or consumers. Some principal examples of conduct that could constitute an unlawful restraint include:

- entering into exclusive supply or purchase agreements;
- entering into exclusive distribution agreements for a particular territory;
- requiring customers or distributors to resell Trinseo products only within specific territories or only to certain customers or classes of customers;
- discriminating in price, terms, or services between comparable customers buying the same products for the same end use market;
- refusing to supply one product or service to a customer unless the customer also purchases another product or service; and
- requiring a customer or distributor not to sell products below, or above, certain prices.

Again, any proposal that involves any element of the foregoing conduct should be presented to the Chief Compliance Officer or an appropriate member of the Legal Department for advance review.

6. **Fraud; Interference with Business Relationships.** Trinseo is of course prohibited by law and by this Policy from defrauding any entity or person with which or whom it does business. Trinseo must also refrain from improperly interfering with a competitor's, customer's or supplier's business relationships through false statements, disparagement or other anticompetitive means.
7. **Mergers, Acquisitions, Joint Ventures, Licenses.** Trinseo may not undertake any mergers, acquisitions, or joint ventures that reduce competition. Unlawful acquisitions may occur when one actual or potential competitor attempts to acquire another if the effect of the transaction is to substantially reduce competition. Certain acquisitions of suppliers or customers may be prohibited under competition laws if certain arrangements for the licensing of intellectual property, including patents, trade secrets, trademarks and copyrights are involved. Accordingly, all of the foregoing activities must be reviewed in advance by the Chief Compliance Officer or an appropriate member of the Legal Department.

8. **Cooperation with Official Investigations.** This Policy requires Trinseo and Trinseo's Personnel to cooperate with all reasonable requests for information or investigatory assistance from the competition law agencies or authorities of any applicable jurisdiction. All requests by a representative of any such agency or authority for an interview with any of Trinseo's Personnel, or for information or copies of documents or access to files, must immediately be referred to Trinseo's Chief Compliance Officer. In addition, any request made in litigation by a private party for information or access to personnel or files must immediately be referred to Trinseo's Chief Compliance Officer or an appropriate member of the Legal Department.
9. **Notice of Litigation By or Against Trinseo.** Trinseo's Chief Compliance Officer must be notified before Trinseo threatens to or actually institutes litigation under any jurisdiction's competition laws, and before Trinseo or any of Trinseo's Personnel complain to or notify a competition law authority or agency about the actions of any other entity or person. In the event litigation is threatened or brought against Trinseo by a competition law agency or authority, or by a competitor, customer, or supplier, Trinseo's Chief Compliance Officer must be notified immediately.
10. **Penalties and Discipline.** Trinseo and Trinseo's Personnel are potentially subject, for violation of the competition laws of each and every jurisdiction in which Trinseo does business, to serious civil and criminal penalties. These potential penalties include substantial fines or damage awards against Trinseo and possible imprisonment for Trinseo's Personnel who violate such laws. In addition, this Policy requires that Trinseo's Personnel who violate any applicable competition laws will be subject to Company discipline, up to and including termination of employment.
11. **Compliance in New Jurisdictions.** If Trinseo commences business in additional nations or other new competition law jurisdictions, the Chief Compliance Officer shall assess the competition law requirements of such areas and advise Trinseo's Personnel with regard to compliance with those requirements. The Chief Compliance Officer shall also monitor the conduct of Trinseo's business in such new jurisdictions and take whatever action may be necessary and appropriate to assure that Trinseo and Trinseo's Personnel comply with the laws of such new jurisdictions and with this Policy.

# **COMPETITIVE INTELLIGENCE POLICY**

## **Policy for Gathering Competitive, Business, Manufacturing and Technical Information**

Good business practice dictates that companies be knowledgeable about the activities of the companies or businesses with whom they compete, with whom they intend to compete or conduct business, or whom they may wish to acquire.

This information must be gathered without violating (1) competition laws, (2) other laws that protect proprietary information, or (3) this Competitive Intelligence Policy (the “Policy”), which reflects the Trinseo Code of Business Conduct. Under no circumstances will Trinseo\* use illegal practices (such as theft, bribery, misrepresentation, or espionage through electronic devices) or unethical business means to obtain competitive information.

### **Scope**

These Guidelines were developed by Trinseo to assist in conducting Trinseo’s business around the world, and define appropriate conduct for employees who collect or use competitive intelligence on behalf of Trinseo. However, since they do not cover every situation and since laws will vary by jurisdiction, consult an appropriate member of the Legal Department or the Chief Compliance Officer if you have any questions.

### **Employee Responsibility**

Any Trinseo employee who desires or commissions the gathering of competitive information is responsible for seeing that it is gathered within the framework of this Policy. You are also responsible for contacting your global functional or business leader, an appropriate member of the Legal Department or the Chief Compliance Officer if you have any questions or if you know of any violation of the Policy.

## **Basic Principles and Recommended Behavior**

### **Competitive Information**

Competitive information may be defined as “commercially useful ideas or facts,” i.e., any data or plans that relate to the conduct of a business. Information may be technical in nature (process, design, formula or method of manufacture, etc.) or relate to business activities (names of customers, capital plans, marketing plans, financial data, etc.). Trinseo considers such information about Trinseo, itself, confidential. Therefore, we recognize that other companies will also consider their technical and business information to be confidential.

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## Basic Principles

- **Right to Protect Proprietary Information** – Trinseo respects the right of a competitor to have its proprietary information protected from disclosure and will not violate such rights in seeking competitive information. However, rights in confidential information are lost when its secrecy is waived by publication, either directly by a company or by its employees or agents acting on its behalf. Court decisions and laws conflict and are not clear as to what constitutes waiver by publication. Therefore, it is impossible to provide rigid guidelines on what constitutes a waiver and efforts to obtain information on this basis must be reviewed on a case-by-case basis.
- **Information Gathering Methods** – The gathering of competitive information must comply with applicable laws; Trinseo will not use illegal or unethical means of gathering competitive information. Always be careful when contacting a competitor since contacts with competitors involving matters such as pricing, marketing strategies, customers, markets, costs or future manufacturing plans, can expose Trinseo, and the individual, to liability for violating competition or other business conduct laws. It is Trinseo’s practice to take a conservative approach to such issues.
- **Duty of Investigation** – If competitive information is obtained from someone working with or for the owner and that information would be deemed confidential if it were owned by Trinseo, there is an obligation to establish whether the information was disclosed with or without restriction. Perhaps the best approach to do so is the direct approach: Ask if the information is confidential and if the answer is “no,” take any further steps needed to make sure that is true.
- **Responsibility for Agent’s Actions** – Trinseo’s agents and consultants must observe these guidelines. Trinseo may be held responsible for the behavior of an agent or consultant hired by Trinseo to obtain competitive information unless the agent’s or consultant’s action was unauthorized and unintended by Trinseo. Consulting and agency agreements should include a commitment to adhere to this Policy.
- **Identification** – When seeking information that could be deemed confidential, employees will not hide the fact that they are seeking information on behalf of Trinseo where disclosure of their relationship to Trinseo is a condition or requirement to obtaining the information.
- **Disclosure and Use by Trinseo** – All competitive information gathered for Trinseo is limited to disclosure and use for the benefit of Trinseo and will not be used for any personal benefit or disclosed to outsiders or to less-than-wholly owned Trinseo subsidiaries, without at least second-level supervisor approval.
- **Public Information** – The use of information that has been disclosed to the public cannot be restricted. All information found in generally available publications, in other public communications or in the public view may be freely used and communicated.
- **Disclosure to Trinseo** – Competitive information disclosed to Trinseo, its affiliates or its agents can be used for the benefit of Trinseo if the information is not subject to restriction of confidentiality and the use of the information does not violate Trinseo compliance with (1) competition law, (2) other business laws or (3) this Policy.

- Government Records – There are laws that require companies to disclose information to various levels of government, e.g., to obtain operating or waste disposal permits. It is the obligation of the owner of the information to assert confidentiality for such information and Trinseo has the right to use information not so protected.
- Reverse Engineering – Information derived by researching back from publicly available or legitimately acquired information, materials or samples can be used and communicated by Trinseo. This includes analyzing and/or dismantling a competitor’s product to determine process characteristics if the product is purchased without restrictions on its use. Reverse engineering of software programs requires special procedures and, therefore, should not be attempted except under the control of legal counsel.

*Don't Guess.* If there is any question as to the legality of a particular means being considered to obtain competitive information or the right to use and disclose any information obtained, check with an appropriate member of the Legal Department or the Chief Compliance Officer for advice

## **CONFLICT OF INTERESTS POLICY**

All Trinseo's\* employees, particularly including its officers and directors, have an obligation to avoid actual or potential conflicts of interest, or the appearance thereof, in their work for Trinseo. This Conflict of Interests Policy (the "Policy") establishes the guidelines within which Trinseo expects its employees to conduct themselves. For the purposes of this Policy, "Trinseo" includes Trinseo LLC and all of its affiliates and subsidiaries, and all of the employees, officers and directors of each. The basic purpose of this Policy is to provide assistance in identifying circumstances that may involve a conflict of interest and to encourage Trinseo's employees, officers and directors to seek clarification or guidance whenever they have any reason for concern that such a conflict may exist.

### **Basic Elements of a "Conflict of Interests"**

The basic principle of this Policy is that the choice of individuals or corporations with whom the Company may have a business relationship, and the terms and conditions of that relationship, **must be determined solely on the basis of the best interests of the Company**. The self-interest of any employee must not be permitted to affect any such choices.

A potential conflict of interests arises when an employee (hereinafter, the term "employee" includes officers and directors as well) or any associate or relative of an employee, is in a position to influence a decision that may result in a personal gain for that employee, or for an associate or relative of that employee, as a result of Trinseo's business dealings. For the purposes of this Policy, a relative is any person who is related by blood, marriage or adoption, or whose relationship with the employee is similar to that of persons who are related by blood, marriage or adoption. For the purposes of this Policy, an associate means (a) a corporation or organization of which such employee is an officer or partner, or is, directly or indirectly, the beneficial owner of five percent (5%) or more of any class of equity securities; and (b) any trust or other estate in which such employee has a substantial beneficial interest or as to which such employee serves as trustee or in a similar capacity. In addition, the conflicting interests referred to throughout this Policy may be direct or indirect (the interest might be that of the employee, or an associate or relative), and the interests may be financial or of any other type that is of value to the employee, relative or associate.

It is not possible to describe all of the situations that might constitute a conflict of interests. The mere existence of a relationship between an employee and an outside firm is not a conflict per se. However, if an employee has any influence on transactions, contracts or policies involving Trinseo and the outside firm, it is imperative that he or she disclose immediately to his or her supervisor, to the Legal Department or to the Chief Compliance Officer the existence of any actual or potential conflict of interests. The relevant circumstances may then be evaluated and, if necessary, safeguards established to protect all parties. The particular facts of each situation will determine whether a potential conflict exists. Such facts would include among many others the amount and type of business involved, the extent to which the employee could influence Trinseo's decisions with respect to the transaction, and whether the interest was of such a nature that it might affect the objectivity or the business judgment of the employee. In each case, the determination of whether a

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conflict exists will be based upon a thorough and objective consideration of all of the relevant facts involved. The Legal Department and the Chief Compliance Officer are available to assist in making such determinations.

## Particular Types of Transactions in Which Conflicts May Arise

Business transactions in which there may be conflicts of interests include, for example and without limitation:

- the establishment of a contractual relationship;
- the purchase or lease of materials, supplies, equipment or facilities;
- the purchase of advertising space and/or time;
- the investment or borrowing of funds;
- the selection and use of consultants or other professional advisors, and
- the selection or supervision of agents and employees.

## Typical Conflicts of Interests

Generally speaking, it would be considered in conflict with Trinseo's interests, and a violation of this Policy, for an employee, directly or indirectly, to engage in any of the activities described below without prior disclosure to and approval by Trinseo:

1. **Interest in another organization.** To have an interest in any organization (other than owning less than five percent (5%) of the shares of stock in a corporation traded on a national securities exchange or over-the-counter) that has, or is seeking to have, business dealings with the Company, where there is an opportunity for preferential treatment to be given to or received from such organization, or that is or plans to be engaged in any business that is similar to Trinseo's businesses.
2. **Interest in a property transaction.** To buy, sell or lease any kind of property, facility or equipment from or to Trinseo, or to any company, firm or individual that has or is seeking to have a business relationship with Trinseo, such as an underwriter, contractor, supplier, agent or customer.
3. **Acting for another firm seeking business with, or for a competitor of, Trinseo.** To serve as an officer or director of any other company, or in any management capacity for, or as a consultant to any individual, firm or other company that is doing or seeking to do business with Trinseo that is engaged in business that is similar to Trinseo's businesses.
4. **Revealing confidential information.** To disclose to, release or discuss with anyone not employed by Trinseo any data or information about Trinseo not already available to the public (including without limitation, information or data relating to decisions, operations, procedures, plans, earnings, financial condition, financial or business forecasts, services or products), or to use such information to the personal advantage of the employee.

5. **Holding other positions to the detriment of Trinseo.** To hold additional positions of employment with other employers, or to engage in any businesses or activities, whether or not for profit, that necessitate the devotion by the employee of considerable amounts of time, or that may result in a conflict or an apparent conflict between the private interests of the employee and the interests of Trinseo.

## **Gifts, Entertainment and Awards**

Gifts. Employees may accept a gift of only very limited value from a vendor with whom Trinseo is currently doing business, has recently done business or expects to do business, and only as a matter of courtesy. As a general rule, gifts with a value of more than \$100 or local equivalent are not appropriate and should be reviewed by the Legal Department or the Chief Compliance Officer before acceptance. In limited, exceptional cases, gifts with a value exceeding that threshold may be accepted for immediate re-delivery to Trinseo or to a charitable organization chosen by Trinseo to receive such gifts. In addition, employees may not ever solicit or accept, directly or indirectly, any cash or monetary equivalents, objects of value or preferential treatment from any person or enterprise that currently has or recently has had, or may reasonably be expected to have in the future, business with Trinseo. Employees who are offered gifts that could violate the foregoing guidelines should promptly report the offer to the Legal Department or the Chief Compliance Officer. The gifts generally will be refused or returned, accompanied by a letter explaining Trinseo's policy, or will be donated to a charitable organization. Copies of receipts from charities for any donations must be submitted to the Chief Compliance Officer.

Business Entertainment. Business entertainment, whether provided by Trinseo or to Trinseo employees, may be appropriate and in the best interests of Trinseo. Employees should bear in mind, however, that in accepting or providing business entertainment they must avoid the creation of any interest, obligation or situation that could conflict or appear to conflict with Trinseo's best interests. All business entertainment must have a clear and appropriate business connection, must be modest and reasonable in nature and amount, and must not be allowed to influence, or appear to influence, any employee's business judgment.

Awards. Trinseo's Personnel work as a team, and the accomplishments of Trinseo are the accomplishments of the team and not any one individual. Trinseo's Personnel may therefore not accept individual monetary awards from external sources when the basis of such award is related to contributions or activities which draw on the reputation, experience, products or information of Trinseo. Trinseo may from time to time receive awards which Trinseo's Personnel may accept on behalf of Trinseo in accordance with Trinseo policies.

## **Holding Public Office**

Though Trinseo's policy is to encourage public involvement by its employees, election or appointment to public office may create a conflict of interest or an appearance thereof. That is because an employee could then be in the position of attempting to serve two employers concurrently, whose interests may be inconsistent or even adverse. Alternatively, Trinseo and the employee could be subject to public criticism that the employee is using an office or public trust to serve Trinseo's private interest. In addition, the holding of such public office, under certain circumstances and depending upon the laws of the particular jurisdiction, may give rise to a claim that there has been a violation of applicable law. Accordingly, the holding of a public office must be specifically disclosed to, and approved by, Trinseo in advance and will be monitored by Trinseo

during the employee's term of office to assure that any conflicts that arise are dealt with appropriately, in the interest of both the employee and Trinseo.

## **Prohibited Transactions Under ERISA**

Under the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), certain employees are fiduciaries, and Trinseo and certain employees and their relatives are or may be deemed to be "parties in interest" with respect to Trinseo's employee benefit plans. Any employee who is a fiduciary or party in interest with respect to any such plan must not engage in or permit any employee benefit plan to engage in any prohibited transaction as defined in ERISA. Prohibited transactions include, among others, a sale, exchange or leasing of any property between such plan and a party in interest; the lending of money or other extension of credit between such plan and a party in interest; the furnishing of goods, services or facilities between such plan and a party in interest; and the transfer to, or use by or for the benefit of, a party in interest of any assets of such plan. If any employee should become aware of any such transaction involving any of Trinseo's employee retirement or benefit plans, he or she should immediately refer the matter to the Legal Department and/or the Chief Compliance Officer.

## **Application of Policy to Associates and Relatives of Employees**

In all cases stated above, this Policy also prohibits any associate or relative (blood or by marriage) of any employee from participating in or encouraging any of the prohibited activities, or assisting or encouraging any employee's participation in a prohibited activity. Any violations of this Policy by an associate or relative of an employee, or the failure by an employee to report any violations of this Policy by an associate or relative, may be enforced with regard to such employee, in appropriate circumstances, as if he or she had personally violated this Policy.

## **Reporting and Implementation of This Policy**

As noted above, any questions that arise under this Policy must be immediately brought to the attention of the Legal Department and/or the Chief Compliance Officer, with full disclosure of all relevant facts and circumstances of which the employee involved is aware. This requirement is designed for the benefit of employees as well as Trinseo, since it helps employees to meet their responsibilities under this Policy.

If an employee discloses a conflict or potential conflict of interests, or such a conflict comes to light other than by voluntary employee disclosure, the matter will be reviewed by the Legal Department and/or the Chief Compliance Officer and discussed with the employee(s) involved, as appropriate. Trinseo will provide the employee with prompt and actionable guidance on this Policy's requirements.

If it is determined that a conflict, or the unacceptable appearance of a conflict, of interest is presented by the relevant facts, appropriate action will be taken to avoid or eliminate the conflict, including but not limited to Trinseo or the employee abandoning a proposed transaction; the employee divesting the conflicting interest; or the job functions of the employee being realigned or reassigned. In the case of a conflict of interests that an employee knowingly entered without advance disclosure, review and approval by Trinseo, disciplinary action may be taken, up to and including termination of employment.

# **ENVIRONMENT, HEALTH AND SAFETY**

## **(EH&S) POLICY**

At Trinseo<sup>\*</sup>, we conduct our business of providing innovative solutions and superior materials with integrity and care for our colleagues, our communities, our customers and the environment. Health, safety and protection of the environment are core values that are a part of everything we do.

We are committed to the continuous and measurable improvement of our environmental, health and safety performance. Our goals include eliminating workplace injuries and illnesses, preventing adverse environmental impacts, reducing and preventing wastes and emissions, and promoting resource conservation at every stage of the life cycle of our products.

We fully comply with Environment, Health & Safety (EH&S) laws and regulations and internal EH&S policies and standards that support our core values.

Trinseo is a Responsible Care® company and has implemented the following principles:

- To lead our companies in ethical ways that increasingly benefit society, the economy and the environment.
- To design and develop products that can be manufactured, transported, used and disposed of or recycled safely.
- To work with customers, carriers, suppliers, distributors and contractors to foster the safe and secure use, transport and disposal of chemicals and provide hazard and risk information that can be accessed and applied in their operations and products.
- To design and operate our facilities in a safe, secure and environmentally sound manner.
- To instill a culture throughout all levels of our organizations to continually identify, reduce and manage process safety risks.
- To promote pollution prevention, minimization of waste and conservation of energy and other critical resources at every stage of the life cycle of our products.
- To cooperate with governments at all levels and organizations in the development of effective and efficient safety, health, environmental and security laws, regulations and standards.
- To support education and research on the health, safety, environmental effects and security of our products and processes.
- To communicate product, service and process risks to our stakeholders and listen to and consider their perspectives.

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- To make continual progress towards our goal of no accidents, injuries or harm to human health and the environment from our products and operations and openly report our health, safety, environmental and security performance.
- To seek continual improvement in our integrated Responsible Care Management System® to address environmental, health, safety and security performance.
- To promote Responsible Care® by encouraging and assisting others to adhere to these guiding principles.

Trinseo will devote adequate resources, training, standards and procedures to satisfy this Environment, Health and Safety (EH&S) Policy. Every employee and contractor is responsible for compliance with these principles and policies. We will audit our performance and the Executive Leadership Team will monitor our commitments and progress.

# **GIFT, ENTERTAINMENT AND AWARD POLICY**

## **Giving of Gifts/Providing Entertainment**

### **To Customers, Suppliers, Business Partners and External Stakeholders.**

All gift-giving must be in accord with Trinseo's\* Ethics and Compliance policies, in particular with the following specific policies:

- Anti-Corruption Policy
- Conflict of Interests Policy
- Donations Policy
- Purchasing Ethics Policy
- Travel and Reimbursement Policy

Gift-giving and related expenses should be kept to a minimum, consistent with Trinseo's ethical standards.

In line with the Foreign Corrupt Practices Act and other anti-corruption laws, gift-giving should be initiated by Trinseo. This allows Trinseo to determine that the customer gift is consistent with Trinseo's priorities and the Code of Business Conduct.

Customer gifts are not considered a "donation"; they are treated as business expenses. (Donations are charitable contributions to non-profit organizations to support societal interests, not Trinseo business interests. For more information about charitable donations, see the Trinseo Donations Policy.) The cost for a gift should be charged to the relevant Trinseo cost center, for example, a regional business cost center for a customer gift, or a manufacturing site cost center for a gift to a local community leader.

As a general rule, gifts to customers should not exceed \$100 USD or local equivalent, and the value of all gifts in a single year to any individual employee of a customer should not exceed \$200 USD or local equivalent. This amount is similar to the limit on the value of gifts that Trinseo employees can receive from suppliers. Exceptions to this rule must be approved in advance by an appropriate member of the Legal Department or by the Chief Compliance Officer.

Documentation is required for gifts, and a record should be maintained by the Trinseo employee, who is accountable for initiating/managing the gift giving, including:

- Recipient name and title (or if a group, describe the group)
- Company name;
- Business Relationship (customer, distributor, prospective customer) and how such expenditure relates to the promotion or demonstration, or an explanation of the products or services, or how such expenditure relates to execution or performance of a contract;
- Gift description, manner of payment and value in local currency; and
- Business purpose.

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In addition to gift giving described above, Trinseo recognizes that proper handling of Trinseo's business sometimes requires employees to provide a reasonable amount of meals and entertainment to customers and other persons in connection with Trinseo; however Trinseo discourages extravagant or unnecessary meals and entertainment. Only expenses directly associated with a specific meal or entertainment activity will be paid or reimbursed as meals and entertainment expenses. Business meals and entertainment may be appropriate and in the best interests of Trinseo. Employees should bear in mind, however, that in providing business meals and entertainment, they must avoid the creation of any interest, obligation or situation that could conflict or appear to conflict with Trinseo's best interests. All business meals and entertainment must have a clear and appropriate business connection, must be modest and reasonable in nature and amount, and must not be allowed to influence, or appear to influence, any employee's business judgment.

All gifts must be tracked. Gifts are required to be reported either as part of the Trinseo Travel and Reimbursement Policy or as a business expense as noted in paragraph 4, above.

***When in doubt, check the Trinseo Ethics and Compliance policies, and/or check with the Chief Compliance Officer.***

#### **To Government or Political Officials.**

Trinseo and Trinseo's Personnel are prohibited from corruptly paying, authorizing, offering to pay or give anything of value to any government official (as defined in local anti-corruption laws) or to any political party or party official, or any candidate for political office, to obtain or retain business, direct business to any person, gain improper business advantage or any other improper advantage in any form for Trinseo, Trinseo's Personnel or any other party.

Hospitality, meals, entertainment and other similar gifts shall not be given, directly or indirectly, to government or political officials to improperly obtain influence or reward an official act or decision, or as an actual or intended quid pro quo for any benefit to Trinseo or any member of Trinseo's Personnel.

Hospitality, meals, entertainment and any similar gifts promised, offered or provided on behalf of Trinseo or any member of Trinseo's Personnel to a government or political office must be:

- Reasonable in type and amount and not in cash or cash equivalents;
- In accordance with customary courtesies in the geographic and business areas involved;
- Related to a legitimate business purpose;
- Fully disclosed, as required, to the foreign government;
- Lawful under any applicable anti-corruption laws and under the applicable rules and regulations of the recipient's ministry or department; and
- Properly recorded in Trinseo's books and records.

Even where allowed or allowed within the legal limits, meals, entertainment, gifts and hospitalities must be infrequent because the cumulative effect of regular hospitalities or gifts may create an appearance of improper conduct.

As a general rule, gifts to government or political officials should not exceed \$100 USD or local equivalent, and the value of all gifts in a single year to any individual government or political official should not exceed \$200 USD or local equivalent. Because anti-corruption laws differ

depending upon the jurisdiction, countries may have differing positions on types of payments that are permissible, therefore, please seek approval by an appropriate member of the Legal Department or by the Chief Compliance Officer prior to giving any gift.

It is advisable that Trinseo pays for hospitalities itself, rather than reimburse the individual. Under certain circumstances, it may be required to notify the applicable governmental agency that such expenses will be paid by Trinseo.

**Except for reasonable meals, no payment or promise of payment for hospitality, entertainment or any similar gifts to any government or political official may be made by or on behalf of Trinseo or Trinseo's Personnel on the basis that it is permitted as provided above unless such payment or promise has been approved in advance by an appropriate member of the Legal Department or by the Chief Compliance Officer.**

*For more information or when in doubt, see Trinseo's Anti-Corruption Policy, and/or check with the Chief Compliance Officer.*

## **Receiving of Gifts or Entertainment**

### **1. From Customers, Suppliers, Business Partners and External Stakeholders.**

Trinseo selects products and services on the basis of price, quality and overall suitability for their business purposes. All of our business transactions must be conducted on this basis and be impartial, objective and free of outside influence. Modest gifts, favors, meals and entertainment are often used to strengthen business relationships. However, no gift, favor, meal or entertainment should be accepted if it obligates, or could appear to obligate, the recipient, or if it might be perceived as an attempt to influence fair judgment. No employee, officer, director, family member, agent or agent's family member should accept or receive a gift, meal or entertainment if it:

- Is in cash or cash equivalent (e.g. gift cards);
- Is not consistent with customary business practices;
- Is significant in value (more than \$100 USD or local equivalent) or the value of all gifts accepted or received from one source in a single year exceeds \$200 USD or local equivalent; or
- Violates any laws or regulations. (Many foreign ministries or agencies or public international organizations have separate hospitality rules to consider.)

Employees may accept a gift of only very limited value from a vendor with whom Trinseo is currently doing business, has recently done business or expects to do business, and only as a matter of courtesy. As a general rule, gifts with a value of more than \$100 USD or local equivalent are not appropriate and should be reviewed by the Legal Department or the Chief Compliance Officer before acceptance. In limited, exceptional cases, gifts with a value exceeding that threshold may be accepted for immediate re-delivery to Trinseo or to a charitable organization chosen by Trinseo to receive such gifts. A copy of the receipt from the charity must be submitted to the Chief Compliance Officer. In addition, employees may not ever solicit or accept, directly or indirectly, any cash or monetary equivalents from any person or enterprise that currently has or recently has had, or may reasonably be expected to have in the future, business with Trinseo. Employees who are offered gifts that could violate the foregoing guidelines should promptly report the offer to the Legal Department or the Chief Compliance Officer. The gifts generally will be refused

or returned, accompanied by a letter explaining Trinseo's policy, or will be donated to a charitable organization. A copy of the receipt from the charity must be submitted to the Chief Compliance Officer.

Business meals and entertainment provided to Trinseo employees may be appropriate and in the best interests of Trinseo. Employees should bear in mind, however, that in accepting business entertainment, they must avoid the creation of any interest, obligation or situation that could conflict or appear to conflict with Trinseo's best interests. All business meals and entertainment must have a clear and appropriate business connection, must be modest and reasonable in nature and amount, and must not be allowed to influence, or appear to influence, any employee's business judgment.

If you have any questions, you should seek guidance from the Chief Compliance Officer or through the Ethics and Compliance Hotline.

## **Monetary Awards**

### **1. This portion of the Gift, Entertainment and Award Policy addresses the receipt of monetary awards.**

Trinseo's Personnel work as a team, and the accomplishments of Trinseo are the accomplishments of the team, not any one individual. Trinseo's Personnel may therefore not accept individual monetary awards from external sources when the basis of such award is related to contributions or activities which draw on the reputation, experience, products or information of Trinseo. Trinseo may from time to time receive awards which Trinseo's Personnel may accept on behalf of Trinseo in accordance with the Gift, Entertainment and Award Policy.

Awards to Trinseo or its associated entities may be accepted on the following conditions:

- The awards must be openly and publicly announced;
- Where applicable, other companies must have had an opportunity to compete for the awards based upon the same criteria and standards;
- Internal approvals must be secured from the business leaders and the Legal Department prior to applying for any awards;

### **Awards must be accurately recorded on Trinseo's books or the books of the entity accepting the award; and**

- All relevant taxes must be paid on such an award.
- Awards must not be intended to or perceived as an attempt to influence fair judgment.

**For more information or to ask questions, see Trinseo's Anti-Corruption Policy, and/or check with the Chief Compliance Officer.**

# **GOVERNMENT CONTRACTING POLICY**

## **Fundamental Ethics and Compliance Commitments**

Trinseo\* is committed to the highest standards of ethics and legal compliance. In conducting our business, integrity must underlie all Company relationships, including those with the United States Government, all other governments with whom we deal, and the employees, contractors, agents and representatives of each such government (collectively, the “Government”).

It is Trinseo’s policy to conduct business with the Government in compliance with all applicable laws and regulations, in all of the nations and locations where Trinseo operates. This includes work performed directly for the Government or for any of our customers who sell or incorporate Trinseo products in performing their Government contracts or subcontracts.

Consistent with Trinseo’s goal of ensuring ethical conduct and legal compliance, all Trinseo employees working under Government contracts must familiarize themselves with the matters addressed in this Government Contracting Policy (the “Policy”), as well as all other Government procurement laws and regulations that pertain to the projects on which they are working. If you have any questions about this policy, or any law or regulation applicable to Government contracting, you should talk with your supervisor, an appropriate member of the Legal Department or the Company’s Chief Compliance Officer.

Your failure to comply with these standards may result in disciplinary action, up to and including termination of employment. Violations of these standards may also constitute violations of law and may result in civil or criminal penalties for you, your supervisors, and/or Trinseo. Moreover, violations can result in the Government terminating our existing contracts and/or suspending or debaring Trinseo from selling our products to the Government and its contractors. If you have or receive any information that one or more of these standards of conduct was, may have been or may in the future be breached, it is your responsibility to immediately report such information to the Legal Department or the Chief Compliance Officer.

## **Accuracy of Information Provided to Governments**

Knowingly providing inaccurate or misleading information to the Government is a serious offense. Examples include inflating costs or making statements that are dishonest during negotiations, or misrepresenting the progress of work. It is essential that Trinseo employees carefully review for accuracy all proposals, quotes, reports, invoices and other information and documents before submission to the Government or to a customer who is or may be selling or incorporating our products under a Government contract.

## **Strict Prohibition of Bribes, Gratuities and Kickbacks**

The Government strictly prohibits contractors from offering or giving gratuities to an official or employee of the Government to obtain favorable treatment. “Gratuities” can be anything of value, including meals, entertainment, and gifts. Even if a Government employee is willing to accept the

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gratuity, you must act consistently with the agency's rules and report any suspected violations. The U.S. Foreign Corrupt Practices Act, the OECD Convention on Combating Bribery of Foreign Public Officials, the U.N. Convention Against Corruption, the Company Law of China and the Supplementary Provisions Regarding Crimes of Corruption and Bribery, and the anti-corruption laws of other nations in which Trinseo does business extend the rule against gratuities to Government officials in nations of which the bribe-offeror is not a citizen. In addition, Trinseo's Anti-Corruption Policy strictly prohibits such payments or the provision of items of value to Government officials. Moreover, Trinseo's prohibition against improper payments extends beyond the Government and Government officials, as well. In no event may any Trinseo employee offer, give, or receive bribes, kickbacks, or gratuities from any person seeking to obtain favorable treatment or otherwise affect the award, terms or performance of any Government contract.

## **Conflicts of Interests Must Be Avoided**

Government business must be conducted with complete impartiality and preferential treatment for none, including any Trinseo division, operating unit, or joint venture. Trinseo employees must stay alert to the potential for conflicts and strictly avoid even the appearance of a conflict of interests.

## **U.S. Procurement Integrity Act**

Trinseo employees involved in bids or solicitations under U.S. Government contracts must comply with the Procurement Integrity Act. Generally speaking, this federal law prohibits obtaining or disclosing non-public information about a competitor's pricing or technical strategy, or a federal agency's source selection plans before the award of a contract. Even obtaining information from Government personnel could be a violation of this Act. The Act also imposes restrictions on recruiting former or current government employees. Approval by the Legal Department or the Chief Compliance Officer must be acquired before engaging in any discussions with such persons about employment opportunities with Trinseo.

## **U.S. Allowable Costs and Time Charging**

With regard specifically to the United States, the cost principles in Federal Acquisition Regulation (FAR) Part 31 regulate what costs can be proposed and/or billed to the Government. While these rules will not always apply to Trinseo's contractual arrangements regarding Government work, it is important to be aware that they exist and of the general nature of what they prescribe. For the most part, costs are allowable as long as they are reasonable, benefit the contract, and do not conflict with other terms or standards. Some costs are allowable only if they meet certain specific criteria. Other costs are expressly unallowable, such as for entertainment, alcoholic beverages, or political contributions. For employees who submit timecards, it is essential to do so accurately. For example, it is not permissible to charge the Government or its contractors for time not actually worked, or to charge time on one contract when the time worked was on a different contract. These fundamental rules apply regardless of the type of contract.

## **Restrictions on Lobbying**

Trinseo and its employees and agents are prohibited by law and this Policy from using funds derived from a Government contract to influence or attempt to influence an officer or employee of a Government agency or legislative body in connection with obtaining a contract or contract

modification. This Policy also prohibits Trinseo and its employees, agents and representatives from influencing or attempting to influence a Government official in connection with obtaining a contract or contract modification, except for Trinseo's usual and customary marketing and sales efforts such as are used with regard to non-Government commercial customers.

## **Strict Prohibition on Trafficking in Persons**

The U.S. Government and many other Governments have a zero tolerance policy regarding trafficking in persons. In particular, U.S. Trinseo employees must be aware of the U.S. Government's restrictions that prohibit (1) obtaining, recruiting, harboring, or transporting persons for labor, services, or commercial sex acts by use of threats, force, abuse, fraud or coercion; (2) procuring commercial sex acts during the period of performance; and (3) using forced labor in connection with performing Government contracts. Trinseo is required to advise you that violations of these restrictions could result in disciplinary actions up to and including termination of employment.

## **Certification of Compliance**

Each Trinseo employee, contractor and agent responsible for work on a Government contract must certify in writing that he or she is in compliance with this Policy and with the Government laws, rules and regulations applicable to the contract involved. Any questions regarding such certification, or the application or interpretation of any Government laws, rules or regulations, should be raised with an appropriate member of the Legal Department or with the Chief Compliance Officer immediately.

# **INFORMATION HANDLING POLICY**

## **Background**

Each day employees and others at Trinseo\* are entrusted to manage the information required to conduct business for Trinseo. This information exists in many forms and is generically called “Trinseo information.” Much of this information, if deliberately or inadvertently disclosed, could provide others a business advantage or could cause harm to Trinseo or Trinseo’s public image.

To safeguard Trinseo interests, Trinseo relies on the integrity and awareness of Trinseo employees and others entrusted with Trinseo information to protect this information against theft, espionage, unauthorized disclosure and other such loss.

The relative value of companies’ intangible assets (information) continues to grow much faster than tangible assets. This means that intangibles (sources of value generated by innovation, unique organizational designs, human resource practices and individual knowledge) often are more valuable than the hard capital they support. Experts estimate that U.S. industry invests at least \$1 trillion a year in intangibles and supports an equilibrium market value of at least \$15 trillion. (Nakamura, U.S. Federal Reserve)

According to Gartner Group, an industry research and advisory firm, annual losses to U.S. businesses from pilfered trade secrets may be as high as \$1 trillion. Thus every employee needs to be vigilant to ensure that valuable information is not stolen or inadvertently given away during the course of normal business.

## **Policy Statement**

Every Trinseo information user is responsible for protecting Trinseo information.

## **Requirements**

Individuals who have Trinseo information, either because they created it or are entrusted with it, are responsible for protecting it in a manner matching its degree of confidentiality and resulting information classification. This is true whether or not it is marked, written, spoken or electronic.

Trinseo information must be shared in a manner consistent with its level of information classification.

All Trinseo information should be clearly labeled to reflect its information classification. Each page or part of the information or document should be labeled. The label should be visible when viewed electronically, regardless of the classification.

Trinseo information must be properly disposed of when it no longer needs to be kept, according to its Information Classification and Trinseo’s Records Management Policy.

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## Definitions

1. Throughout this document, “Trinseo” or the “Company” refers to Trinseo LLC and the Trinseo companies, affiliates and subsidiaries.
2. Trinseo Information Users: Anyone who creates, acquires, handles, uses or manages Trinseo Information or Trinseo Information Resources.
3. Trinseo Information: All information or work product, in any form, that has been created using the resources of Trinseo or its agents on behalf of Trinseo or legally acquired from third parties for Trinseo’s use. This information may take any form including: written, spoken, electronic, video tape, audio tape, photographic, microfiche or film, charts, graphs, drawings, notes, calendars, etc. Information may be technical in nature (design, formula or method of manufacture, etc.) or relate to business activities (customer lists, capital authorizations, marketing plans, financial reports, etc.).
4. Trinseo Information Resources: Includes both the information itself and the computer systems and network resources used to process it.
5. Removable Storage Media: Information or data storage devices such as optical media (CD, DVD), floppy disks, zip drives, image cards, etc. that can be removed or disconnected from a computer that records or reads information on the storage device.

## Classification Descriptions

**TRINSEO RESTRICTED – For internal use only** – Trinseo Information, that if communicated or given to people outside of Trinseo, could have competitive value to others and/or could adversely affect Trinseo in other ways; but the likelihood of serious harm is low.

**TRINSEO CONFIDENTIAL – Do not share without permission** – Very important or sensitive Trinseo information that if communicated or given away would give competitive value to others and/or would adversely affect Trinseo in other ways.

**TRINSEO CONFIDENTIAL – Received from third party source** – Information obtained under a formal agreement (secrecy, non-disclosure, etc.) with an external party.

**ATTORNEY-CLIENT PRIVILEGE / ATTORNEY WORK PRODUCT** – Confidential communications between a lawyer and a client relating to legal advice or work done by or for an attorney in anticipation of or in support of litigation or other legal activity. This classification shall be used only after consulting with Trinseo’s Legal Department.

**PERSONAL AND CONFIDENTIAL** – Information personally sensitive to or about an individual Trinseo employee, (e.g., performance evaluations or medical information). This classification is very similar to TRINSEO CONFIDENTIAL, except it is applied to specific types of information. Examples include salary and pay position information, and medical test results.

Detailed guidance for the use of these Classifications and the handling of Trinseo Information will be provided in training materials and on internal Company web sites.

## Scope of Applicability

This Information Handling Policy (the “Policy”) applies to all Trinseo Information in any format including, but not limited to, physical, electronic, and spoken. This Policy applies to all people who create, handle, use or manage Trinseo Information or anyone who has access to Trinseo’s computer systems or information resources. In addition, this Policy applies in all geographies subject to local government law.

## Impact/ Applicability on Subsidiaries, Etc. (Government Contracting)

These Policy statements apply to all Trinseo Information assets. Where a subsidiary or affiliate uses a legal entity name other than Trinseo, it may choose to substitute its own name for “Trinseo” if they own the information or have an agreement with Trinseo.

Subsidiaries include partnerships, and any other entity of which Trinseo owns a substantial portion. Information handling for subsidiaries is administered as follows:

- Wholly-owned subsidiaries: If Trinseo owns 100% of a subsidiary, the subsidiary must adopt, and follow, Trinseo’s information handling program.
- Majority-owned or controlled subsidiaries: If Trinseo owns more than 50% but less than 100% of a subsidiary, or if Trinseo exercises management control over the operations of a subsidiary:
  - Trinseo expects the subsidiary to have an information handling program, and to comply with that program.
  - The subsidiary may adopt Trinseo’s program or implement its own functional equivalent.
- Minority-owned or controlled subsidiaries: Trinseo sometimes acquires a minority interest in, and does not exercise management control over the operations of, other entities.
  - Trinseo’s information management groups do not typically interact substantially with these subsidiaries.
  - However, the existence of a working information handling program is a good business practice that will be considered, along with other attributes, by Trinseo management in evaluating and conducting Trinseo’s relationship with such subsidiaries.

## Impact/ Applicability on Contractors

These Policy statements apply to all users of Trinseo Information and Trinseo Information Resources.

## Media Types

This Policy applies to all media types.

## **Devices**

This Policy includes all associated computers and storage, display, access and communication devices.

## **Enforcement**

1. For Trinseo employees, violations of this Policy may subject the person responsible to disciplinary action up to and including termination of employment.
2. For non-Trinseo employees, violation of this Policy may subject the person responsible and/or the company he or she represents to legal action.

## **Exception Process**

The Records Management Committee for Trinseo must approve exceptions to this Policy.

## TRINSEO S.A.

### **INSIDER TRADING POLICY**

The Board of Directors of Trinseo S.A. (together with its subsidiaries, the “Company” or “Trinseo”) has adopted this Insider Trading Policy (the “Policy”). This Policy governs the trading by “Insiders” (as defined below) in the securities of the Company, and any other public company as to which the person has become an Insider during the course of his or her employment or engagement by Trinseo\* with respect to transactions in the Company’s securities, as well as to derivative securities related to the Company’s securities, whether or not issued by the Company, such as exchange-traded options, and those of any other public company.

#### **A. Persons to Whom This Policy Applies**

This Policy applies to all officers of the Company, all members of the Company’s Board of Directors, and all employees of Trinseo as well as the members of their immediate families (as defined in the General Commentary to Section 303A.02(b) of the New York Stock Exchange Corporate Governance Standards) and members of their household. This Policy also applies to all agents of, and consultants and contractors to, the Company who receive or have access to “Material Nonpublic Information” (as defined in Section 16, below) regarding the Company, its Business Partners and other public companies. These groups of people are generally referred to in this Policy as “Insiders.” Any person who possesses Material Nonpublic Information regarding the Company is an Insider for so long as the information is not publicly known. Any employee of Trinseo can be an Insider from time to time, and would at any such time be subject to this Policy. This Policy also applies to any person who receives Material Nonpublic Information from any Insider.

This Policy should not be interpreted to modify any agreements the Company and any of its executive officers, non-executive officers or employees may have entered into regarding the disclosure of confidential information.

#### **B. Terms of This Policy**

The Company has adopted this Policy to avoid even the appearance of improper conduct on the part of all Insiders. Accordingly, it is the policy of the Company to prohibit the unauthorized disclosure of any Material Nonpublic Information acquired in the workplace and the misuse of Material Nonpublic Information in any securities trading. Any Trinseo directors, officers and employees who violate this Policy shall be subject to disciplinary action by the Company, which may include suspension, ineligibility for future participation in the Company’s equity incentive plans, or termination of employment.

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1. **Trading on Material Nonpublic Information.** No Insider, and no immediate family member or household member of any such person, shall engage in any transaction involving a purchase or sale of the Company's securities during any period commencing with the date that he or she possesses Material Nonpublic Information, and ending at the close of business on the second Trading Day following the date of public disclosure of that information. As used herein, the term "Trading Day" shall mean a day on which national securities exchanges and the New York Stock Exchange are open for trading. A "Trading Day" begins at the time trading begins on such day. This restriction on trading does not apply to transactions made under a trading plan adopted pursuant to SEC Rule 10b5-1(c) and approved in writing by the Company (an "Approved Rule 10b5-1 Trading Plan").

It also violates Company policy for any Insider to use any nonpublic information about the Company for personal benefit. These prohibitions against trading while in possession of Material Nonpublic Information (or using such information for personal benefit) also apply to Material Nonpublic Information about any other company that has been obtained in the course of a person's work for the Company.

2. **No Exceptions.** Transactions that may be necessary or useful for independent reasons (such as the need to raise money for a personal expenditure in the event of an emergency) are not excepted from this Policy. The securities laws do not recognize such mitigating circumstances and, in any event, it is the purpose of this Policy to avoid even the appearance of an improper transaction in order to preserve the Company's reputation for adhering to the highest standards of conduct.
3. **No Tipping.** No Insider shall disclose ("tip") Material Nonpublic Information to any other person (including any immediate family member or household member) where such information may be used for trading in the securities to which that information relates. Nor shall such Insider make recommendations or express opinions on the basis of Material Nonpublic Information as to trading in such securities. This prohibition against "tipping" also applies to Material Nonpublic Information about any other company that has been obtained in the course of a person's work for the Company.
4. **Restrictions on Selective Disclosure of Material Nonpublic Information.** No Insider shall disclose in any manner any Material Nonpublic Information to any person except as follows: (i) disclosure to a person who has signed an appropriate agreement to hold such information in confidence; (ii) disclosure to senior management of the Company; (iii) disclosure to personnel who need the information to carry out their services to the Company and who agree to hold the information in confidence; (iv) disclosure to the Company's lawyers, accountants or advisors if the information disclosed is related to a matter on which they are involved; or (v) as approved by the Chief Compliance Officer of the Company.
5. **Inadvertent Disclosures.** If any Insider should inadvertently selectively disclose any Material Nonpublic Information to any person not covered by the exceptions listed in Section 4 above, Company policy requires that such inadvertent disclosure be reported as soon as possible to the Chief Compliance Officer of the Company. Such inadvertent disclosure may arise because of a mistaken belief about the materiality or nonpublic nature of the disclosed information, the identity of the recipient of such disclosure, the

applicability of a confidentiality agreement or numerous other reasons. Applicable law (Regulation FD, in particular) generally requires the Company to publicly disclose promptly the information that had been inadvertently disclosed.

6. **Confidentiality of Nonpublic Information.** All nonpublic information relating to Trinseo is the property of the Company, and the unauthorized disclosure of such information is forbidden. All directors, officers and employees of, and consultants and contractors to, the Company shall (i) keep all memoranda, correspondence and other documents that reflect nonpublic information in a secure place, such as a locked office or a locked file cabinet, so that they cannot be seen by third persons and (ii) not discuss Material Nonpublic Information where it may be overheard, such as in restaurants, elevators, restrooms and other public places. In the event of any inquiries from outside the Company, such as from a stock analyst, for information (e.g., financial results and/or projections) that may be Material Nonpublic Information, the inquiry should be referred to the Company's Public Affairs office, which is responsible for coordinating and overseeing responses to such inquiries.
7. **Liability for Insider Trading.** Insiders may be subject to penalties of up to \$5,000,000 and up to 20 years in jail for engaging in transactions in the Company's securities at a time when they have knowledge of Material Nonpublic Information regarding the Company.
8. **Liability for Tipping.** Insiders may also be liable for improper transactions by any person (commonly referred to as a "tippee") to whom they have disclosed Material Non-public Information regarding the Company or to whom they have made recommendations or expressed opinions on the basis of such information as to trading in the Company's securities. The Securities and Exchange Commission has imposed large penalties even when the disclosing person did not profit from the trading. The National Association of Securities Dealers, Inc. uses sophisticated electronic surveillance techniques to uncover insider trading.
9. **Black-Out Periods.** The period beginning at the close of the stock market on the tenth business day of the third calendar month of each fiscal quarter, and ending at the close of the market on the second Trading Day following the date of public disclosure of the financial results for the previously completed quarter or year, is a particularly sensitive period of time for transactions in the Company's securities. This sensitivity is due to the fact that during these periods, officers, directors and certain employees may possess Material Nonpublic Information about the expected financial results for the quarter or year. Accordingly, it is the Company's policy to treat this period of time as a "Black-Out Period." All directors and officers and those other employees of the Company or its subsidiaries who have access to the Company's internal financial statements, are prohibited from trading during such Black-Out Period.

In addition to these standard Black-Out Periods, from time to time depending on the relevant circumstances, the Company may impose a special Black-Out Period during which the same prohibitions and recommendations shall apply. Any persons affected by a special Black-Out Period will be notified by the Company in advance. The Black-Out Period restrictions on trading do not apply to transactions made under an Approved Rule 10b5-1 Trading Plan. However, the Black-Out Period restrictions do encompass the fulfillment of "limit orders" by any broker for a director, officer or employee, and the

brokers with whom any such limit order is placed must be so instructed at the time it is placed.

It should be noted that even outside of any Black-Out Period, any person possessing Material Nonpublic Information may not engage in any transaction in the securities of the company to which such information relates until such information has been known publicly for at least two Trading Days. This restriction on trading does not apply to transactions made under an Approved Rule 10b5-1 Trading Plan.

10. **Employee Benefit Plan Blackout Periods.** An individual account plan “blackout period” exists whenever the Company or any plan fiduciary temporarily suspends for more than three consecutive business days the ability of 50% or more of the plan participants or beneficiaries under all individual account plans maintained by the Company to acquire or dispose of any of the Company’s equity securities held in the plans. This Policy extends this prohibition to all officers of the Company, in addition to the restrictions described in Section 17(c) of this plan.
11. **Pre-Clearance of Trades.** The Company has determined that those executive officers and directors of the Company, and any other persons identified by the Company from time to time, who are listed on Attachment 1 may not trade in the Company’s securities at any time without first complying with the Company’s “pre-clearance” process, as described below.

Each such person listed on Attachment 1 must contact the Company’s Chief Compliance Officer at least two Trading Days prior to commencing any trade in the Company’s securities. The Chief Compliance Officer will consult as necessary with senior management of and/or outside legal counsel to the Company before clearing any proposed trade. If the pre-clearance is denied, such denial must be kept confidential by the person requesting pre-clearance. Unless otherwise provided, pre-clearance of a trade is valid for three business days. If the trade is not executed within that time, the person requesting pre-clearance must request pre-clearance again.

Although a person listed on Attachment 1 wishing to trade pursuant to an Approved Rule 10b5-1 Trading Plan need not seek pre-clearance from the Company’s Chief Compliance Officer before each trade takes place, such a person must obtain Company approval of the proposed Rule 10b5-1 Trading Plan.

This pre-clearance process is an integral part of this Policy but is not to be interpreted as financial, personal or legal advice with respect to securities trading or investments.

The Company may also find it necessary, from time to time, to require compliance with the pre-clearance process from certain employees, consultants and contractors in addition to the persons listed on Attachment 1.

12. **Individual Responsibility.** Every Insider and covered employee has the individual responsibility to comply with this Policy against insider trading, and to forego a proposed transaction in the Company’s securities if it would violate this Policy. Each Insider and any other covered employee must carefully consider how regulators and others might view a transaction in the Company’s securities in hindsight.

An Insider may, from time to time, have to forego a proposed trade in the Company's securities even if he or she planned to enter the trade before learning of the Material Nonpublic Information and even though the Insider believes he or she may suffer an economic loss or forego anticipated profit by waiting.

13. **Rule 10b5-1 Trading Plans.** Rule 10b5-1 Trading Plans may only be entered into when a Company trading window is open and when the individual is not in possession of any material inside information. All 10b5-1 Trading Plans must be approved in advance and in writing by the General Counsel or Chief Compliance Officer. Once a 10b5-1 Trading Plan is approved, trades made pursuant to such Plan will not require additional pre-clearance, as long as the Plan specifies the dates, prices and amounts of the contemplated trades or establishes a formula for determining dates, prices and amounts.
14. **Avoidance of Speculative Transactions.** No Insider may engage at any time in speculative transactions in the Company's securities, as described below.
  - (a) **Short Sales.** No Insider may engage in short sales of the Company's securities. More specifically, no Insider may sell any equity security of the Company if such person either (a) does not own the security sold or (b) does not deliver the security against such sale within twenty days thereafter or does not within five days after such sale deposit the security in the mails or other usual channels of transportation, unless such sale is approved in writing by the Chief Compliance Officer of the Company.
  - (b) **Publicly-Traded Options.** No Insider may engage in transactions in puts, calls or other derivative securities related to any equity securities of the Company, on a national securities exchange or in any other organized market. A "derivative security" includes any option, warrant, convertible security, stock appreciation right or similar security with an exercise or conversion price or other value related to the value of any equity security of the Company. This prohibition does not, however, apply to any exercise of Company stock options pursuant to any Trinseo option or equity incentive plan(s) or any other benefit plans that may be adopted by the Company from time to time, any sale of Company shares in connection with any cashless exercise (if otherwise permitted), or payment of withholding tax upon the exercise, of any such stock option.
  - (c) **Hedging Transactions.** No Insider may engage in hedging or monetization transactions, such as zero-cost collars and forward sale contracts, which would allow such person to continue to own the covered securities without the full risks and rewards of ownership.
  - (d) **Margin Accounts and Pledges.** No Insider may hold Company securities in a margin account or pledge Company securities as collateral for a loan. An exception to this prohibition may be granted where a person wishes to pledge Company securities as collateral for a loan (not including margin debt) and clearly demonstrates the financial capacity to repay the loan without resort to the pledged securities. Any person who wishes to pledge Company securities as collateral for a loan must submit a request for approval to the Company's Chief Compliance Officer at least five (5) business days prior to the proposed execution of documents evidencing the proposed pledge.

15. **Applicability of Policy to Material Nonpublic Information Regarding Other Companies.** This Policy also applies to Material Nonpublic Information relating to other public companies, including the Company’s vendors, customers and suppliers (“Business Partners”), when that information is obtained in the course of employment with, or the performance of services on behalf of, the Company. Civil and criminal penalties, and termination of employment, may result from trading on inside information regarding the Company’s Business Partners or other public companies. All officers, directors, employees, consultants and contractors must treat Material Nonpublic Information about the Company’s Business Partners and other public companies in the same manner as would be appropriate for such information regarding the Company.
16. **Definition of Material Nonpublic Information.** It is not possible to provide a precise and comprehensive definition of every possible item which could constitute “material” information. Nonetheless, in general information should be regarded as material if there is a substantial likelihood that a reasonable investor would consider the information important in making an investment decision regarding the purchase or sale of the Company’s securities, given the total mix of available information. Information is “nonpublic” if it is not known by persons outside of Trinseo or its agents, advisors and representatives, i.e., it has not been previously disclosed publicly and is otherwise not available to the general public, and even after disclosure has been made, until a reasonable time has passed after it has been disclosed by means likely to result in widespread public awareness (e.g., SEC filings, press releases or publicly accessible conference calls). Such information is what is referred to in this Policy as Material Nonpublic Information.

As a general rule, information is considered nonpublic until at least the second full Trading Day after the information is released. For example, if the Company announces financial earnings before trading begins on a Tuesday, the first time you can buy or sell Company securities is the opening of the market on Thursday (assuming you are not aware of other Material Nonpublic Information at that time). However, if the Company announces earnings after trading begins on that Tuesday, the first time you can buy or sell Company securities is the opening of the market on Friday.

As additional guidance, there are certain types and categories of information that are particularly sensitive, and should be presumed to be material in the absence of highly compelling facts and circumstances which would conclusively demonstrate the contrary. Examples of such information (whether positive or negative for the Company) include:

- Financial results, budgets or projections;
- Changes in order rates;
- Execution or termination of significant contracts with suppliers and customers and other business partners;
- A significant pending or proposed merger, joint venture or acquisition;
- The disposition or acquisition of significant assets;
- Significant developments related to intellectual property;
- Significant developments involving corporate relationships;
- Changes in dividend policy;
- New service announcements of a significant nature;
- Stock splits;
- Stock repurchases;

- Significant changes in executive management;
- Board of Directors personnel or governance changes;
- New equity or debt offerings;
- Significant actual or threatened litigation;
- Significant new products or discoveries;
- An event requiring the filing of a current report on Form 8-K under the Securities Exchange Act of 1934, as amended (the “Exchange Act”).

If you are uncertain whether you possess Material Nonpublic Information, you must always consult the Company’s Chief Compliance Officer before trading in the Company’s securities. And whether or not you are an Insider, if you are in possession of Material Nonpublic Information you may not trade in the securities of the Company or any other company to which the Material Nonpublic Information relates.

17. **Certain Exceptions to this Policy.** This Policy does not apply in the case of the following transactions, except as specifically noted:

- (a) **Stock Option Exercises.** This Policy does not apply to the exercise of an employee stock option acquired pursuant to an equity incentive or similar plan, or to the exercise of a tax withholding right pursuant to which a person has elected to have the Company withhold shares subject to a stock option to satisfy tax withholding requirements. This Policy does apply, however, to any sale of Company stock as part of a broker-assisted cashless exercise of an option, or any other market sale for the purpose of generating the cash needed to pay the exercise price of an option.
- (b) **Restricted Stock Awards.** This Policy does not apply to the vesting of restricted stock, or the exercise of a tax withholding right pursuant to which a person elects to have the Company withhold shares of stock to satisfy tax withholding requirements upon the vesting of any restricted stock. The Policy does apply, however, to any market sale of restricted stock.
- (c) **401(k) Plan.** This Policy does not apply to purchases of Company securities in the Company’s 401(k) plan resulting from the periodic contribution of money to the plan pursuant to a payroll deduction election. This Policy does apply, however, to certain elections available under the 401(k) plan, including: (a) the decision to begin to make periodic contributions that are allocated to the Company stock fund; (b) an election to increase or decrease the percentage of an employee’s periodic contributions that will be allocated to the Company stock fund; (c) an election to make an intra-plan transfer of an existing account balance into or out of the Company stock fund; (d) an election to borrow money against your 401(k) plan account if the loan will result in a liquidation of some or all of the Company stock fund balance; and (e) an election to pre-pay a plan loan if the pre-payment will result in allocation of loan proceeds to the Company stock fund.
- (d) **Other Similar Transactions.** Neither any other purchase of Company securities from the Company or sale of Company securities to the Company is subject to this Policy.

- (e) **Gifts.** Bona fide gifts of Company securities are not subject to this Policy unless the person making the gift has reason to believe that the recipient intends to sell the securities at a time when the person making the gift (or a family member or other related person or entity covered by this Policy) would be prohibited from doing so.
  - (f) **Trust Transfers.** Transfers of Company securities to or from a trust are not subject to this Policy.
  - (g) **Mutual Fund Investments.** Transactions in mutual funds that are invested in Company securities are not subject to this Policy.
18. **Post-Termination Transactions.** This Policy continues to apply to your transactions in Company securities even after you have terminated your employment with the Company. Thus, if you are in possession of Material Nonpublic Information when your employment terminates, you may not trade in Company securities until that information has become public or is no longer material.
19. **Inquiries, Concerns and Reports.** Please direct any questions or concerns you may have, or make any reports, as to any of the matters discussed in this Policy to the Company's Chief Compliance Officer. You may also use the Trinseo Ethics Hotline for this purpose. Please remember, however, that you have ultimate responsibility for your adherence to this Policy.

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The Company expects strict compliance with the foregoing policies by all persons subject to this Policy. Any failure to observe these guidelines may result in serious legal difficulties for you, as well as the Company. Furthermore, any failure to follow the letter and spirit of this Policy will be considered a matter of extreme seriousness and may serve as a basis for termination of employment or service.

*Adopted effective as of April 17, 2014*

**ATTACHMENT 1**

**DIRECTORS, OFFICERS, AND OTHER EMPLOYEES SUBJECT TO  
THE PRE-CLEARANCE PROCEDURE**

- 1. Directors**
  
- 2. Officers**
  
- 3. Other Employees**

## **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 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 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”), and the sanctions imposed by the Office of Foreign Assets Control (“OFAC”).

**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 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 for delivery to destinations against which the United States maintains sanctions or embargoes. Trinseo’s Personnel

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and Affiliates are prohibited from engaging in transactions with countries against which the United States maintains trade sanctions. Furthermore, Trinseo's Personnel are prohibited from dealing with persons, corporations or other organizations located in countries against which the United States maintains sanctions or embargoes.

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

- Burma (Myanmar)
- Cuba
- 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
- 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. 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 countries.
- 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 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.

# **LABOR AND HUMAN RIGHTS POLICY**

## **Labor Policy**

Trinseo\* believes that respect for the dignity, rights and ambitions of all people is a cornerstone of business excellence in the 21st century. This Labor and Human Rights Policy (the “Policy”) extends to all employees of Trinseo and to all people who work at any of Trinseo’s facilities around the world. We expect the suppliers and contractors with whom we do business to embrace similar values and standards.

Trinseo recognizes and respects all labor and employment laws – including those respecting freedom of association, privacy and equal employment opportunity – wherever it operates. Trinseo believes that working positively and directly with employees best serves their interests. Trinseo also strives to work cooperatively with duly chosen employee representatives in the common pursuit of the interests of the employees and the Company’s mission.

## **Child Labor Policy**

The Child Labor Policy deals with Trinseo’s efforts to have a positive impact on the reduction of unlawful labor and child exploitation.

Trinseo complies with all child labor laws. Trinseo understands that children may legitimately perform tasks that do not interfere with their education, do not negatively affect their health, safety, and development, and are in compliance with applicable local, state, national, provincial, and international laws and regulations. Trinseo will endeavor to make its contractors, vendors and suppliers aware of its expectations and commitments to this Policy.

- Trinseo will comply with applicable child labor laws and regulations at all manufacturing operations and business facilities globally, including without limitation any legally required governmental postings about child labor laws and regulations.
- Trinseo will maintain accurate documentation as legally required to verify the age of all employees covered by applicable child labor laws and regulations.
- Hours of work, rates of pay and benefits will be in compliance with applicable laws and regulations.

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- At no time will an employee under the locally applicable legal age be placed in a hazardous occupation in violation of applicable law.
- Employment of children, based on the locally applicable legal age, will be subject to additional internal EH&S review and audit of tasks and responsibilities as appropriate.
- Contractors, vendors, and suppliers working at Trinseo facilities will be subject to the provisions of this Policy. In addition, the Trinseo Purchasing department will communicate the intent and expectations of this Policy in all contractual agreements with Trinseo contractors, vendors, and suppliers.
- Trinseo will establish apprenticeship programs, summer hire programs, and high school/junior college technical programs that are intended to encourage further education and development of children.

# **PRIVACY POLICY**

## **Purpose and Scope of This Policy**

This Privacy Policy (the “Policy”) protects the personal information of Trinseo’s\* employees. The Policy is designed to detect, prevent and mitigate any theft of employees’ personal information or identity; guide the response to any such information security breaches; and establish proper destruction practices for paper and electronic records containing personal information. This Policy and the practices that implement it are intended to achieve Trinseo’s compliance with all applicable laws, rules and regulations in each of the jurisdictions in which it operates globally.

In general, the personal information protected under this Policy is information capable of being associated with a particular individual through one or more identifiers. Common identifiers include a Social Security number, a driver’s license number, a state identification card number, a bank account number, a credit or debit card number, a passport number, an alien registration number or a health insurance identification number. Personal information generally does not include publicly available information that is lawfully made available to the general public from federal, state or local government records or widely distributed media. To the extent any personal information is improperly disclosed by Trinseo, Trinseo will comply with applicable laws, rules and regulations governing such disclosure and the respective consequences in the jurisdictions involved.

Trinseo necessarily provides certain personal information of its employees to several health, dental and life insurance companies, and possibly to other providers of services or products for our employees’ benefit. In doing so, it is Trinseo’s policy to select and retain only third-party service providers that are committed to and appear capable of reliably maintaining appropriate security measures to protect personal information.

## **Measures to Protect Employee Personal Information**

### **Building Security**

Trinseo’s facilities have building security measures that restrict the ability of non-employees to enter Trinseo premises, where personal information may be located, without authorization or supervision. Trinseo’s data centers are subject to additional security precautions and security arrangements to prevent any unauthorized access to, review of or usage of personal information contained in those locations.

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## **Limitations on Disclosure and Collection of Personal Information**

This Policy prohibits the disclosure of personal information or confidential information of any kind about an employee to unauthorized persons, and to any person for any purpose which has not been duly authorized under Trinseo's corporate governance procedures. Trinseo also uses security measures that limit access to personal information contained on the payroll system, and on Company computer hard drives.

In addition, under this Policy, Trinseo seeks to request of applicants, employees, vendors and customers only that personal information necessary to its business purposes, and safeguards that information from unauthorized or inadvertent disclosure as set forth above.

## **Computer System Security Requirements**

### **In General**

It is Trinseo's policy to protect personal information by an extensive range of computer system security measures. These measures may include, at a particular Trinseo facility, any of the following: (1) secure user identification protocols; (2) secure access control measures; (3) encryption of records and data containing personal information; and (4) encryption of personal information stored on laptops and portable devices.

### **User Identification Protocols**

Trinseo requires use of confidential passwords and their protection from acquisition or use by unauthorized persons.

### **Access Control Measures**

Trinseo uses technological arrangements that lock down an employee's computer or handheld device if the user has remained inactive for a prescribed amount of time.

Trinseo limits access to network storage and files to its Information Technology staff and other employees with a business need to access particular information.

### **Virus Protection and Firewalls**

All Internet traffic coming to and going from Trinseo's network must pass through a firewall. In addition, only specific types of network traffic are allowed beyond Trinseo's exterior firewalls. E-mail messages originating outside of the network must pass through the firewall and spam filter before they are allowed to enter the e-mail server. All servers run anti-virus software, which scans Trinseo's file-sharing data stores in search of any suspicious (potentially viral) code.

## **Prevention of Potential Identity Theft**

Trinseo of necessity collects some personal information on its employees and applicants for employment. Trinseo may, from time to time, receive and maintain at least some personal information concerning individual contractors, vendors or customers. At the current time, Trinseo is not aware that any identity theft or misuse of such employment or customer information has occurred. It is a fundamental purpose of this Policy to prevent any such theft or misuse.

Personal information that Trinseo collects is required to be contained in secure cabinets or computer files, all of which are to be locked when unattended or not in use. In addition, Trinseo will make all commercially reasonable efforts to assure that any off-site storage facilities used to maintain personal information are secure.

## **Mitigation of Harm and Employee Discipline**

### **Notices from Employees, Customers, Theft Victims or Law Enforcement**

If Trinseo receives a notice regarding possible theft, misuse or improper disclosure of personal information from an employee, from another potential identity theft victim or from law enforcement officials, Trinseo will respond promptly to that notice. Trinseo will exercise all commercially reasonable efforts to prevent, alleviate or mitigate any harm that may result from the theft, misuse or improper disclosure of personal information. Trinseo will also comply with applicable disclosure or remediation requirements of the jurisdiction in which any theft or misuse occurs.

### **Employee Discipline**

A breach or violation of this Privacy Policy may result in discipline of any employee(s) involved, up to and including termination of employment. In addition, it is possible that a breach or violation of this Policy may result in civil litigation against or criminal prosecution of the employee(s) involved.

## **Destruction of Personal Information Records**

This Policy requires the proper and effective disposal of records containing personal information at the end of their retention period. Specifically, personal information on paper records should be redacted, burned, pulverized or shredded prior to disposal. Similarly, electronic data containing personal information should be destroyed or erased so that personal information cannot practicably be read, retrieved or reconstructed.

## **Changes to Policy and Notice of Additional Use**

If the terms of this Policy are modified, expanded or otherwise altered, the changes will promptly be posted on Trinseo's Intranet and Trinseo will take other measures reasonably designed to assure that Trinseo employees receive notice of any such changes to the Policy.

If Trinseo should be legally required, or determines that it is necessary and legally permissible, to use employee personal information for a purpose other than or in addition to the purpose for which the information was originally collected, Trinseo will notify and/or obtain the consent of such employee, to the extent that such notice and/or consent is legally permissible and appropriate in the circumstances.

## **PURCHASING ETHICS POLICY**

At Trinseo<sup>\*</sup>, ethical considerations are integrated into how we conduct our business.

### **Separating the Buy/Sell Relationship**

Reciprocity is illegal in several countries. Any activity that involves an agreed-upon reciprocal buy/sell relationship will not be tolerated at Trinseo and is grounds for termination of the contract with the supplier. Trinseo solicits proposals from existing and potential suppliers, including supply proposals by our customers.

Under normal circumstances, a customer will not be offered a supply position where it is not in Trinseo's best interest from a purchasing perspective.

### **Conflict of Interest**

Trinseo employees live by the rule that they should avoid any activity, investment, or interest that might reflect unfavorably upon the integrity or good name of the Company or of themselves. They are obligated to place Trinseo's interest in any business transaction ahead of any personal interest or personal gain to either themselves or to their spouse, family member, or other individual.

All Trinseo employees shall specifically avoid any conflict of interest by discouraging suppliers from offering gifts and invitations to entertainment events.

A conflict of interest may also arise when an employee or family member has a direct or indirect personal or financial interest in any Trinseo supplier, partner, competitor, or customer, where such interest could influence Trinseo's dealings with such supplier, partner, competitor, or customer.

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# **RECORDS MANAGEMENT POLICY**

## **Background**

Records and information are important Trinseo\* assets. They are vital components of the decision-making process and must be properly managed to obtain their full value. The Company's Records Management Policy (the "Policy") outlines the principles and practices defined by the Company for the proper management of the Company records.

Trinseo shall avoid holding records beyond the established retention times. Trinseo's practice is to enforce all the established retention times. Ultimately, the key rationale of this Policy is to maintain the minimum necessary records in an efficient and organized manner, while allowing successful achievement of business objectives.

## **Policy Statement**

All records, regardless of media type, shall be retained in accordance with this Policy and the Records Manual. This is done in order to: maintain the minimum necessary records in an efficient and organized manner, satisfy governmental requirements, and meet business/functional needs.

## **Guidance**

All records, including audio /visual records and computer-generated material, should include the date, author/function responsible and proper Trinseo information classification (e.g., TRINSEO RESTRICTED – For Internal Use Only).

Every record will have an established retention that is meant to be both the minimum and maximum retention period unless otherwise stated. General Business Records may be kept for a length of time not to exceed three years. Copies may not be kept longer than the retention schedule for that record. However, they may be disposed of sooner.

All records regardless of media type (e.g., paper, microfilm, electronic file, CD) should be retrievable at all times.

The Records Management Committee will develop operating systems and procedures for maintaining and disposing of records in a coordinated manner that complements the successful operation of Trinseo.

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## Definitions

**Company** – Throughout this document, “Trinseo” or the “Company” refers to Trinseo LLC and the Trinseo companies, affiliates and subsidiaries.

**Copies** – Any copies of a record (i.e., not the official retention copy).

**General Business Record** – All records are in this category unless specifically listed otherwise, by function, in the Records Manual.

**Trinseo** – This Policy was developed by Trinseo to assist in conducting Trinseo’s business around the world and define an appropriate records management program. Throughout this document, “Trinseo” or the “Company” refers to Trinseo LLC and the Trinseo companies, affiliates and subsidiaries.

**Trinseo Information** – All information or work product, in any form, that has been created using the resources of Trinseo or legally acquired from third parties for Trinseo’s use. This information may take any form including: written, spoken, electronic, video tape, audio tape, photographic, microfiche or film, charts, graphs, drawings, notes, calendars, etc. Information may be technical in nature (design, formula or method of manufacture, etc.) or relate to business activities (customer lists, capital authorizations, marketing plans, financial reports, etc.)

**Trinseo Information Users** – Anyone who creates, acquires, handles, uses or manages Trinseo Information or Trinseo Information resources.

**Official Record** – There is only one “official retention copy” of each record. It may be the original or a copy.

**Records** – any of the following items:

- a writing of any kind (whether it is the original or a copy; whether draft or final; including documents with notes written in the margin);
- photographic recordings;
- audio recordings;
- video recordings;
- all electronic media;
- micrographics; and
- any other means by which information is recorded or transmitted.

**Records Management** – The systematic control of records from the time of creation until ultimate disposal.

**Records Management Committee** – A Records Management Committee established within Trinseo shall be responsible for the maintenance and implementation of this Policy. The members of this Committee will be appointed by the Shared Services leader of the Company.

**Records Manual** – Listing of record titles and retention times for Trinseo records. The record types are organized by section, and each section will be maintained by the appropriate function.

## **Geographic Applicability**

All Trinseo Information Users are to follow this Policy regardless of geographic location.

## **Impact/ Applicability on Subsidiaries, Etc.**

Subsidiaries include partnerships, and any other entity of which Trinseo owns a substantial portion. Records management for subsidiaries should be administered as follows:

**Wholly-owned subsidiaries:** If a Trinseo subsidiary is directly or indirectly owned 100% by a Trinseo company, the subsidiary must follow Trinseo's records management program.

**Majority-owned or controlled subsidiaries:** If a Trinseo company directly or indirectly owns more than 50% but less than 100% of a subsidiary, or if a Trinseo company exercises management control over the operations of a subsidiary, Trinseo expects the subsidiary to have a records management program (either Trinseo's program or its own functional equivalent), and to comply with that program.

**Minority-owned subsidiaries:** The existence of a working records retention policy is a good business practice. The appropriate Trinseo parent company will take this into consideration, on a case-by-case basis, in cases where it acquires a minority interest in, and/or does not exercise management control over the operations of, another entity.

**Subsidiary Records in Trinseo's Custody:** If records from a subsidiary company are in the possession or custody of Trinseo's Personnel, they must be retained according to Trinseo's policies for that type of record (not the subsidiary's retention schedule), unless an agreement to the contrary has been approved by Trinseo.

## **Impact/ Applicability on Contractors**

This Policy is applicable to anyone who is a Trinseo Information User.

## **Media Types**

This covers records regardless of the media or format (e.g., paper, microfilm, electronic file, CD).

## **Enforcement/ Consequences**

- For Trinseo employees, violations of this Policy may subject the person responsible to disciplinary action up to and including termination of employment.
- For non-Trinseo employees, violation of this Policy may subject the person responsible and/or the company he or she represents to legal action.

## **Exception Process**

Freeze Process: All records will be disposed of at the end of their retention time unless the expired records are held due to a Legal or Tax freeze. Expired records held because of a freeze are not to be retained in the originating department. Contact Tax or the responsible attorney for forwarding instructions.

Local Exceptions: Unless a local retention time has been approved and placed in the Records Manual, the global retention time applies.

In some cases, local law requires a longer retention time than the global Records Manual for one or more categories of records. A longer “local” (e.g., country) retention time may be established in the following manner.

- Obtain written verification from the responsible attorney, identifying the applicable law and its citation. The attorney must verify that there is an actual requirement (rather than a recommendation or suggestion); must verify that the requirement applies to the category of records; and must state the length of time retention is required by that law.
- Submit a proposal for the local retention, along with the attorney’s documentation, to the Records Management Committee.
- Upon approval, the local retention time will be added to the Records Manual, in a section that contains the local retention records for that geographic locale.

## **Effective Date and Reviews**

This Policy will take effect as of June 17, 2010. This Policy should be reviewed as requested by the Records Management Committee.

## **Implementation Approach**

All program changes, and changes to record titles and retention times, will be with the cooperation and final review and approval of the Records Management Committee.

## **Issuing Authority**

The Records Management Committee shall be responsible for the maintenance and implementation of this Policy. Any changes to this Policy will be approved by the Records Management Committee.

## **Applicable Regulations**

All applicable country laws and regulations are considered in the creation and shall be complied with in the implementation of this Policy.

## **RESPECT AND RESPONSIBILITY POLICY**

It is the policy of Trinseo\* that employees be provided a work environment that is respectful and free from any form of inappropriate or unprofessional behavior, such as harassment including sexual harassment, pestering or bullying and any form of unlawful discrimination. This Respect and Responsibility Policy (the “Policy”) applies globally, and to all employees of Trinseo. The application of this Policy in any particular country will conform to applicable local laws, directives, regulations and/or labor agreements and may be supplemented by an area or country specific policy as necessary. Retaliation of any kind against an individual who, in good faith, exercises his or her rights under this Policy, makes a complaint, or cooperates in an investigation is prohibited.

Employees at all levels in the organization have the responsibility to support and contribute to a respectful work environment, which includes avoiding any participation in unacceptable behavior, implied or explicit, that violates this Policy. Employees should promptly address and, where appropriate, report potential violations of the Policy through the designated resources. Employees who violate this Policy are subject to corrective action up to and including termination, appropriate under the circumstances, in conformance with applicable local laws, directives, regulations, and/or applicable labor agreements.

Leaders have the responsibility to create and maintain a respectful work environment, to monitor compliance with this Policy, and to take prompt and appropriate steps to address unacceptable behavior consistent with this Policy to prevent any future violations of this Policy.

### **Why Is a Policy of Respect Important to Trinseo?**

Respect for People is a key value for Trinseo. Positive and productive relationships with co-workers, customers, vendors, and other stakeholders are the foundation for Trinseo’s success. Relationships that are effective deliver innovative ideas, increase productivity, generate sales and drive the satisfaction and commitment of every individual. It is therefore essential that our individual and collective actions create an environment in which those relationships can thrive and everyone can contribute to their fullest potential.

Trinseo’s reputation is also at stake. Any instance of disrespectful, offensive or hostile behavior could place our standing as an employer or partner of choice at risk. The subsequent impact on areas such as recruitment, retention, or customer loyalty, combined with possible financial penalties if the behavior is unlawful could impede our business success. For these reasons, among others, respectful behavior is not an option, but rather an expectation of all employees. All employees should act in a way that will be seen as respectful and responsible from the perspective of the people with whom they interact.

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This responsibility applies equally whether the interactions are occurring within a Trinseo facility or at any other location where Trinseo responsibilities are carried out or business relationships may occur.

### **Examples of Respectful Behaviors Include But Are Not Limited To:**

- Listening to and seeking to understand the views and perspectives of others.
- Creating an environment where people feel comfortable respectfully telling one another if they have been offended.
- Being aware of the sensitivities of others and the potential impact of your actions. For example, one should never assume that his or her comfort level telling or hearing a joke with potentially offensive content would be the same as others in the work group.
- Treating people professionally.
- Reporting, rather than ignoring, instances of inappropriate conduct that jeopardize the well-being of the work environment.

### **Examples of Unacceptable Behaviors Include But Are Not Limited To:**

- Using derogatory or inflammatory language including jokes that make fun of or belittle an individual because of inherent personal characteristics such as ethnicity, sex, gender, race, age, sexual orientation, gender identity, religion, or disability.
- Touching, pinching, brushing up against, or hugging a coworker, customer or other business associate when the physical contact is culturally inappropriate or unwelcome to the recipient.
- Utilizing Trinseo communication tools and resources such as the Internet, e-mail or voice mail to retrieve, view, display or pass along messages or material that could be considered inappropriate, offensive and/or unprofessional. Written or electronic communications or other graphic materials that are of a sexual nature or present a person's personal characteristics, such as race or ethnicity, in a hostile or offensive manner are inappropriate and are prohibited under the Policy.
- Pressuring or requesting a subordinate, coworker, contractor or other business associate for sexual favors.
- Intimidating or sabotaging the work of team members or other employees, or excluding individuals, without a legitimate job- or business -related purpose to do so, from participating in work related or work sponsored activities.

- Destroying or defacing Trinseo property or a coworker's personal property, whether intentionally or as a result of playing pranks or jokes.

## **Complaint Process**

Any report of inappropriate behavior under this Policy is to be taken seriously and will be promptly reviewed and, as appropriate, investigated, consistent with any applicable laws and regulations, and consistent with investigative procedures Trinseo may adopt from time to time. All employees are expected to cooperate fully in any such review and investigation. In general, information gathered under any such investigation will be disclosed only on a need to know basis, but in accordance with applicable data protection laws. Retaliation against anyone participating, in good faith, in the complaint or investigation process will not be tolerated.

Any individual in the Trinseo workplace who believes he or she has been subjected to or has observed a potential violation of this Policy should take one or more of the following steps, depending upon the circumstances:

- Respectfully tell the offending person, regardless of the person's position that the behavior is offensive and to please stop the offending behavior immediately. If an employee does not feel comfortable confronting the offending person or if the offensive behavior continues after the employee has told the person to stop the behavior, the employee should report the potential violation of this Policy to his or her supervisor, Human Resources, or the Trinseo General Counsel.
- Once you have reported a potential violation of this Policy, you will be asked to provide specific facts concerning the alleged offensive behavior, including names, dates and events. Specific information is critical to conducting a fair, impartial, and appropriately thorough investigation.
- At the conclusion of the investigation you will be notified that the investigation has been completed and, if appropriate, that corrective action has been or will be taken.

When it comes to treating others with respect, all employees are expected to play a lead role. Individuals should not ignore the inappropriate behavior or assume someone else will deal with it. All situations should be addressed in an appropriate way under the circumstances. Each person must assume personal responsibility to maintain respect in the workplace.

For more information related to this Policy, please contact your local HR representative.

# **SOCIAL MEDIA POLICY**

## **Executive Summary**

The Social Media Policy (the “Policy”) applies to all venues, tools and applications that fall under the definition of social media, and includes both external, non-Trinseo owned venues and Trinseo-owned websites and applications. All use of external social media in marketing and communication strategies is to be approved prior to publication by Trinseo Public Affairs. Each creative agency supplier is required to understand and adhere to the standards outlined in this Policy.

This is the Social Media Policy of Trinseo<sup>\*</sup>. If you are an employee of Trinseo or one of its affiliates or subsidiaries (hereinafter collectively referred to as “Trinseo”) or are a contractor for one or more of these entities who is creating or contributing to blogs, wikis, social networks, virtual worlds or any kind of social media (as that term is defined herein) that implicates Trinseo, whether Trinseo-sponsored or otherwise, this Policy shall apply. All use of social media in Trinseo’s name or on its behalf must be approved by Trinseo Public Affairs (in coordination with Trinseo Legal) in advance. Each employee and contractor who participates in social media on behalf of Trinseo or in its name are required to understand and adhere to the standards outlined in this Policy. In addition, all Corporate Identity Guidelines and Trinseo’s policies are to apply, including the Code of Business Conduct, Competitive Information Policy, Information Handling Policy, and Respect and Responsibility Policy.

The widespread use of Social Media today often leads to the blurring of the lines between leisure and work. Trinseo fully respects the legal rights of our employees and contractors in all countries in which we operate. In general, what you do on your own time is your affair. However, activities in or outside of work that affect your job performance at Trinseo, the performance of others at Trinseo or Trinseo’s business interests are a proper focus for Company policy. This Policy will continue to evolve as new technologies and social media tools evolve and/or emerge, and you are encouraged to periodically review this Policy to keep up with future updates. For questions regarding this Policy, or for questions specific to the use of Social Media, please contact the Trinseo Public Affairs Team.

## **What Is Social Media?**

The term “Social Media” (also known as Web 2.0) is used to describe websites and online tools that allow Internet users to interact with each other by sharing information, opinions, knowledge or common interests. Social media empowers people to create their own media, generate content and share it with global audiences.

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Social media can be grouped into three segments:

1. **Consumer-Generated Media**
  - Blogs, vlogs, moblogs, microblogs
  - Content sharing sites (YouTube, Flickr, Instagram, Vine)
  - Really Simple Syndication (RSS)
  - Podcasts and webcasts
2. **Social Networks**
  - Social networking websites (MySpace, Facebook, Twitter)
  - Business networking websites (LinkedIn)
3. **Wisdom of Crowds**
  - Online communities
  - Yahoo Message Boards, Google Groups, MSN Groups
  - Wikis (Wikipedia)
  - Content discovery and sharing (Digg, Newsvine)

## **When to Use Social Media**

As with any communications tactic, Social Media is a set of tools and a means to an end, not the end itself. Choosing to add Social Media to the mix should be a decision based on your objectives and your target audience, and doing so should create clear value for Trinseo.

Generally, objectives will fall under one or more of these categories:

- **Listening** – Gleaning market and customer insight and intelligence.
- **Engaging** – Having a discussion with your audience to communicate your message and get messages in.
- **Energizing** – Letting your customers tell your prospects on your behalf (viral, word of mouth).
- **Supporting** – Getting your customers to self-support each other.

- Embracing – Building better products and services through collaboration with clients.

External-facing Web 2.0 technologies can be used to provide additional touch points for customer interaction:

- Create online communities for customers around a brand, a market, an issue, etc.
- Build customer and brand loyalty by engaging with online customers around certain topics or concerns.
- Provide a forum for customers to engage with one another and provide candid feedback concerning brands and services.
- Improve the “stickiness” of [www.styron.com](http://www.styron.com)/[www.trinseo.com](http://www.trinseo.com) by providing a dynamic reason for customers to keep coming back.
- Improve online experience for customers to increase customer satisfaction.
- Improve ability to respond to customer wants and needs (foundation of marketing messages).
- Supplement marketing campaign effectiveness with consumer-generated insights (breeding ground).
- Ultimately, increase customer satisfaction through the development of new products and services geared towards the customer-base that helped create them.

If you choose to add Social Media to the mix, be prepared to:

- Dedicate resources to manage communities and engage in conversations.
- Establish a process for managing content and for disseminating consumer-generated insights.
- Define ROI and metrics for measuring impact.
- Define a strategy to drive traffic.

Social media can have a positive impact on search results by creating a wider network of conversations, publications and traffic sources to websites or landing pages.

## **Guiding Principles**

1. Be transparent. Some social media sites allow users to work anonymously, using pseudonyms or false screen names. Trinseo discourages the use of pseudonyms or false screen names in blogs, wikis or other forms of online participation that relate to Trinseo, our businesses or issues with which Trinseo is engaged. Be transparent and

honest. If you are blogging about your work for Trinseo use your real name, be clear who you are, and identify that you work for Trinseo. Nothing gains you more notice in the online social media environment than honesty – or dishonesty. If you have a vested interest in something you are discussing, be the first to point it out. But also be smart about protecting yourself and your privacy. What you publish will be around for a long time, so consider the content carefully and also be cautious in disclosing personal details.

Be thoughtful about how you present yourself in online social networks. The lines between public and private, personal and professional are blurred in online social networks. When you identify yourself as an employee or contractor of Trinseo within a social media network, you are associated with Trinseo. Thus, it is important to ensure that content you share in these forums is consistent with your work at Trinseo and under the Code of Business Conduct.

2. Use a disclaimer. If you are speaking in any social media forum about a specific issue related to your work for Trinseo, make it clear that what you say is representative of your views and opinions and not necessarily the views and opinions of Trinseo unless you have been authorized to speak in Trinseo’s name or on its behalf. If you discuss Trinseo or your work with Trinseo in your personal social media forums, you should include the following standard disclaimer: “The views expressed in this post are my own and don’t necessarily represent the positions, strategies or opinions of Trinseo or any of its affiliates or subsidiaries.”

Managers and executives take note: This standard disclaimer does not by itself exempt Trinseo managers and executives from a special responsibility when using social media. By virtue of their positions, managers and executives must consider whether personal thoughts they publish may be misunderstood as expressing Trinseo positions and a manager should assume that his or her team will read what is written. A public blog is not the place to communicate policies to employees.

3. Endorsements of Trinseo products and services. Pursuant to the Federal Trade Commission’s (FTC) Guides Concerning the Use of Endorsements and Testimonials in Advertising (16 CFR Part 225) employers will be held responsible for “endorsement” statements made by their employees regarding the employers’ products and services, even if those statements are made without the employers’ permission or knowledge. Employers also face liability for failure to make proper disclosure of an employment relationship in connection with an endorsement. Accordingly, Trinseo employees are strictly forbidden to make statements endorsing any Trinseo products or services on any Social Media site without Trinseo’s prior approval, whether such statements are made in connection with your job at Trinseo or otherwise. If Trinseo has pre-authorized you to endorse a Trinseo product or service, when you do so you must state in explicit terms that you are an employee of Trinseo and that you are making your endorsement statement as a representative of Trinseo.
4. Respect copyright and fair use laws. For Trinseo’s protection as well as your own, it is critical that you show proper respect for the laws governing copyright and fair use of

copyrighted material owned by others, including Trinseo's own copyrights and brands. You should never quote more than short excerpts of someone else's work and you should always credit that work to its author. It is good general blogging practice to link to others' work rather than re-creating the material of others. Keep in mind that laws will be different depending on where you live and work. Do not use the Company's logo, boilerplate, trademark or proprietary graphics, photographs or video of Company premises or products without authorization from a business/functional manager, Legal and/or appropriate Public Affairs leader.

5. Protect confidential, proprietary and personal information. Social media encourages users to share "what's on your mind" – but makes no delineation between personal or professional communications. However, it's critical that you do not blur what is work-related versus what is personal information. Do not disclose or use Trinseo Confidential or proprietary information or that of any other person or company in any online social media platform. For example, before posting photographs of employee meetings or customer events, you must get a signed Consent and Release form from those featured in the photographs. The Trinseo Code of Business Conduct and Advertising guidelines always apply to Social Media.

You must not comment on confidential Trinseo financial information such as future business performance, business plans, or prospects anywhere in the world. This includes statements about an upcoming quarter or future periods or information about joint ventures, and applies to anyone including conversations with Wall Street analysts, press or other third parties (including friends). If someone from the media or press contacts you regarding your social media activities that relate to Trinseo, speak to your manager before responding.

Trinseo's policy is not to comment on rumors in any way. You can reply to inquiries by saying, "no comment" or refer a third party to the appropriate Public Affairs spokesperson. Do not deny or affirm them – or suggest either denial or affirmation in subtle ways.

When engaging in Trinseo-approved use of Social Media, customers, clients, business partners, distributors or suppliers should not be cited or obviously referenced without their prior written approval. When utilizing Social Media personally, never identify a Trinseo customer, client, partner, distributor or supplier by name and never discuss confidential details of a Trinseo customer/client engagement. When utilizing Social Media on Trinseo's behalf, social media platforms permit customers, clients, business partners, distributors and suppliers to participate, so be sensitive to who will see your content. Do not share personal information about Trinseo workforce members or identify them unless their job responsibilities include representing Trinseo to the public or unless they have given their consent.

6. Respect your audience and your coworkers. Remember that Trinseo is a global organization whose employees and customers reflect a diverse set of customs, values and points of view. If you are using Social Media on behalf of Trinseo, Trinseo's Code of Business Conduct and other Trinseo policies apply. Blogs, wikis, virtual worlds,

social networks, or any other Social Media tools should not be used for internal, Trinseo business-related communications. Do not use your personal blog or other online Social Media to air your work-related differences in a manner inconsistent with Trinseo's Code of Business Conduct.

7. Social Media should support business or Company strategy. Pre-approved use of Social Media should be used in a way that adds value to our business. If use of social media will improve sales, provide better information to clients or customers, streamline business processes or foster valuable engagement with stakeholders, then it can add value. Questions about the use of social media for business or communications use should be directed to the appropriate digital manager.
8. Avoid engaging in debates in social media forums. When you see misrepresentations made about Trinseo by media, analysts or others, you may want to use your personal social media forum (blog, Facebook or other) – or join someone else's to comment. However, never make disparaging remarks. Stick to the facts, identify your appropriate affiliation to Trinseo and make clear that your opinions are your own and not necessarily those of Trinseo. If you speak about a competitor, make sure what you say is factual and do not defame or discredit the competitor's products or services. Online arguments may draw attention and thus drive traffic to the social media forum, but it will not contribute to the health or welfare of Trinseo's corporate reputation. Do not try to goad a competitor into a debate.
9. Admit to errors. If you make a mistake in representing a fact or situation, admit to your mistake and correct it quickly. In a blog, if you choose to modify an earlier post, make it clear that you have done so. Many times, deleting a post or comment does not remove it permanently from the social media forum. Thus it's important to admit your mistake, refer to your post and again, keep it fact-driven and professional.
10. Use your best judgment. If you're about to publish something that makes you uncomfortable, review the guidance in this Policy and consider the reasons why you are feeling uncomfortable. If your comment is related to a Trinseo business, discuss it with your manager. Ultimately, however, you have sole responsibility for what you post to your blog or publish in any form of online Social Media.
11. Don't forget your day job. Ensure that your personal online activities do not interfere with your job responsibilities or commitments to customers. The use of Social Media for non-business -related activities is strictly prohibited during internal Company meetings. Please adhere to the Trinseo Code of Business Conduct and other Trinseo policies for proper use of Company equipment for personal use.

## **Adhering to the Trinseo Code of Business Conduct**

The Trinseo Code of Business Conduct and other Trinseo policies provide the foundation for this Policy. The same principles and guidelines that apply to Trinseo employees' activities in general, as found in the Trinseo Code of Business Conduct, apply to activities online and all forms of Social Media.

The widespread use of Social Media today often leads to the blurring of the line between leisure and work. Trinseo fully respects the legal rights of our employees in all countries in which we operate. In general, what you do on your own time is your affair. However, activities in or outside of work that affect your job performance, the performance of others, or any Trinseo business interests are a proper focus for Company policy.

What does a Trinseo employee's personal responsibility mean in online social media activities? Online social media enables individuals to share their insights, express their opinions and share information within the context of a globally distributed conversation. Each tool and medium has proper and improper uses. While Trinseo encourages its employees to engage in the use of Social Media, it is important for those employees and contractors who choose to do so to understand what is recommended, expected and required when you discuss any Trinseo-related topics, whether at work or on your own time.

Know the Trinseo Code of Business Conduct (pages 2-12). If you have any confusion about whether you ought to publish something online, chances are the Code of Business Conduct will resolve it. Pay particular attention to what it says about proprietary information, about avoiding misrepresentation and about competing in the field. If, after checking, you are still unclear as to the propriety of a post, it is best to refrain and seek the advice of your manager.

## **Legal Requirements**

For content approval and questions related to Trinseo-approved use of Social Media, please contact your respective business attorney. All content for external publication must be routed and approved through the Legal Department before publication. Legal and Public Affairs should be engaged early in any social media initiative planning process to provide input, and all social media projects need to be approved by Legal before implementation. The creation of online communities (internal or external) may require resources from Legal that would need to be approved with time to budget and implement.

**Risk Assessment;** There are legal risks involved in publishing to certain Social Media venues that could potentially cause litigation. Please contact Trinseo Public Affairs for questions about the need for a Legal/Data Privacy Risk Assessment.

If you have any questions on this Policy or the use of Social Media in marketing and communication strategies, please contact Trinseo's Public Affairs Team.

## **COMPANY VOLUNTEERISM GUIDELINES/POLICY**

Trinseo's\* community relations strategy is focused on establishing and promoting the Company's reputation, improving the quality of life in locations where it operates and ensuring its license to operate. One way that our Company can help make a meaningful difference and build community support for our operations is through employee volunteerism.

Following are Trinseo guidelines for supporting employee volunteerism in our communities.

Direct supervisors and local site, functional or business management should consider their specific work group circumstances in applying these guidelines.

- Volunteer work on Company time should not occur routinely unless there is a specific business need, such as customer participation or work group team building. Volunteer work should not interfere with job responsibilities or performance.
- Trinseo Company Intranet pages can be used to publicize non-profit efforts and events only when the Company has contributed a donation in support of the organization or event.
- Employees should refrain from using Company mail or e-mail to solicit contributions or volunteers for an organization or event.
- Supervisors should not solicit donations or volunteer time from subordinates.
- Trinseo has no preferences about where employees might volunteer. Diversity is important and meaningful to our communities because it helps assure that the broadest number of organizations who need volunteers will be helped.
- People leaders can recognize employees who volunteer by way of special events such as an informal breakfast or lunch. Work groups can recognize the volunteering achievements of team members in meetings.
- Please work with your Public Affairs contact to enable appropriate publicity around volunteer events and accomplishments.
- The Company has a written policy for Company charitable contributions/donations. Employees should not commit to making donations from the Company unless they have the authority to do so and are complying with the Trinseo Donations Policy.

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\* Throughout this document, "Trinseo" or the "Company" refers to Trinseo and the Styron affiliated companies to Trinseo. Styron previously announced plans to change the name of all Styron affiliated companies to Trinseo. Some, but not all, of the Styron companies have completed the name change process and are currently known as Trinseo; Styron companies that have not completed this process will continue to do business as Styron until their respective name changes are complete.

## **WHISTLEBLOWER POLICY FOR REPORTS OF VIOLATIONS OF LAW**

It is Trinseo's\* policy to comply with all laws and regulations that are applicable to its operations, on a global basis. Furthermore, under this Whistleblower Policy (the "Policy"), it is also Trinseo's policy to protect its employees against any adverse action or retaliation as a result of their reporting any violation of a law or regulation. Specifically, this Policy prohibits the imposition of any disciplinary or other adverse action on any employee as a result of the employee:

- Disclosing information to a government or law enforcement agency or personnel, where the employee has reasonable cause to believe that the information shows a possible or actual violation of law or regulation; or
- Furnishing information, testifying or otherwise participating in an investigation or proceeding regarding any conduct that the employee in good faith believes involves a violation of law or regulation (provided that such information is not a trade secret or subject to any assertion by Trinseo of its attorney-client privilege); or
- Providing information to any management or investigative personnel employed or otherwise engaged by Trinseo with regard to a violation of law or regulation.

In furtherance of this Policy, Trinseo may provide favorable employment or financial consideration, in a form and manner determined to be appropriate to the circumstances and in Trinseo's discretion, to an employee who reports in good faith information regarding a violation of law or regulation.

This Policy does not protect any report or the furnishing of any information that is known by the employee to be false, or is otherwise not provided in good faith.

Any employee who believes that there has been a violation of, or failure to follow, this Policy by Trinseo or any Trinseo employee may raise, and is encouraged to raise, that concern with his/ her supervisor or other supervisory manager, a Human Resources representative, the Chief Compliance Officer, or through Trinseo's Ethics and Compliance Hotline. Any such concerns will be addressed promptly, and Trinseo's "No Retaliation" Policy strictly forbids any retaliation in any form against an employee who raises such a concern in good faith.

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