



Human Trafficking and Anti-Slavery Statement For Financial Year 2024

LyondellBasell Industries N.V. (together with each of its subsidiaries, “LYB”) is committed to conducting business in an ethical and responsible manner, which includes complying with applicable slavery, forced labor and human trafficking laws. In accordance with the requirements of the United Kingdom’s Modern Slavery Act 2015 and The California Transparency in Supply Chains Act of 2010 (the “Acts”), this statement provides information on the programs and standards implemented at LYB to ensure that slavery, forced labor, child labor and human trafficking are not taking place in any of its supply chains and in any part of its business.

LYB’s Supplier Code of Conduct and Global Procurement Policy

LYB has adopted and incorporated in its standard contracts and purchase order terms and conditions a [Supplier Code of Conduct](#) that requires vendors to comply with applicable law, protect internationally recognized human rights and prohibit the use of forced, indentured or involuntary labor (including modern slavery and human trafficking) and child labor. The Supplier Code of Conduct establishes human rights standards for our supply chain in accordance with legal requirements and EU Directive proposals. Compliance with the Supplier Code of Conduct principles is evaluated through suppliers’ risk assessments, ratings, sustainability assessments, and audits. LYB has also adopted a Global Procurement Policy that outlines the framework of principles and requirements any function needs to follow when purchasing goods and services on behalf of LYB, including a requirement to implement processes to ensure compliance with LYB’s Human Rights Policy.

LYB’s Code of Conduct

LYB’s [Code of Conduct](#) embodies our dedication to conducting business ethically and responsibly by obeying the law and enabling a safe and productive work environment. LYB’s Code of Conduct states that “we take great care to uphold human rights in all of our operations and facilities, regardless of local custom. We recognize that our Company has a responsibility to respect and protect human rights by doing the following:

- We forbid the use of forced, bonded (including debt bondage), indentured, or involuntary labor, exploitative prison labor, slavery, or trafficking in our operations;
- We prohibit harsh or inhumane treatment of all workers, including actual or threatened corporal punishment;
- We will not retain passports or other original employee documents unless required by law, and will not restrict employee access to such documents;
- Neither we nor the recruitment partners we work with charge any fee for employment, and we do not ask for any refundable security deposit to be paid for employment purposes;
- We prohibit child labor. For purposes of employment, we define ‘child as anyone under sixteen years of age, unless national or local law stipulates a higher mandatory

school leaving or minimum working age, in which case the higher age applies. We do not hire people under the applicable mandatory minimum;

- We uphold all fair wage and hours laws, wherever we work; and
- We always promote the health and safety of our workers in every location in which we conduct business.”

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

LYB expects all employees to report possible violations or concerns regarding our Code of Conduct. We offer an independent whistleblower helpline and website, EthicsPoint, that enables anyone to report complaints and violations of law and regulations anonymously. For EU countries, LYB has adopted an EU Whistleblower Policy setting out applicable reporting procedures and protections for those who raise concerns. Our Chief Compliance Officer, who has a direct reporting line to the Audit Committee, provides regular reports to the Audit Committee on compliance with the Company’s Code of Conduct, related training programs, and complaints received and investigated by the compliance function.

The failure to report any suspected Code of Conduct violation or misconduct immediately may also be considered a violation of the Code of Conduct. When an allegation of an employee Code of Conduct violation is substantiated, the relevant management team reviews the investigation findings and determines disciplinary action consistent with the severity of the violation. Disciplinary action can include verbal or written warning, suspension with or without pay, demotion or, for the most serious offenses or repeated misconduct, employment termination.

LYB’s Human Rights Policy

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

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

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

Authorized Economic Operator (AEO) in the European Union

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

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

(Signature is required only by the UK Modern Slavery Act and not the California Transparency in Supply Chains Act.)



Jacques Aigrain, Chair of the Board of Directors of LyondellBasell Industries N.V.

The above information has been provided as required by the UK Modern Slavery Act and the California Transparency in Supply Chains Act and was approved by the Board of Directors of LyondellBasell Industries N.V. on 27 February 2025.