



Global Policy on Anti-Bribery & Anti-Corruption



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Table of Contents

Our Global Policy on Anti-Bribery and Anti-Corruption	1
Importance of Compliance	1
Our Responsibility	1
What Is a Bribe?	2
Bribery of Government Officials	2
Commercial Bribery	2
Facilitation Payments and Kickbacks	3
Working with Agents, Distributors and Other Third Parties	3
Due Diligence and Approval Process	3
Red Flags	3
Accounting and Record Keeping Requirements	4
Reporting Possible Violations	4
Avient Ethics Hotline	4
Protection from Retaliation	4
Quick Reference: ABAC DOs and DON'Ts	5

Our Global Policy on Anti-Bribery and Anti-Corruption

Avient strictly prohibits fraud, bribery, and other corrupt business practices in all of our business operations anywhere in the world. This Policy applies to Avient and its subsidiaries, including all officers, employees, agents and other third parties acting on Avient's behalf. Avient will take disciplinary action against any individual found to have engaged in bribery or corruption, up to and including termination.

Avient has developed a comprehensive program for implementing this Policy through appropriate guidance, training, investigation and oversight. The Corporate Ethics Officer, in coordination with the Legal Department, is responsible for giving advice on interpreting and applying this Policy, supporting training and education, and responding to reported concerns.

Corrupt business activities prohibited by this Policy include, but are not limited to: bribes, facilitation payments, kickbacks, inappropriate or excessive gifts or entertainment, or anything else of value made or offered to obtain an undue business advantage. These types of corrupt business activities apply to anyone we do or would like to do business with. Offering anything of value should not be confused with reasonable and limited, lawful expenditures for gifts, business entertainment, and other legitimate activities directly related to the conduct of Avient's business. ¹

Importance of Compliance

No matter where in the world we operate, Anti-Bribery, Anti-Corruption (ABAC) Laws apply to our business, including but not limited to the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. While individual country laws vary, these laws make it illegal to engage in any form of corruption or bribery and require companies to keep books, records and accounts in reasonable detail. Violations can result in damage to Avient's reputation, severe penalties and jail time.

¹ Refer to the Gifts and Hospitality section of the Avient Code of Conduct and our Gifts and Entertainment Policy to determine if your proposed expenditure is permitted.

It is important to comply with ABAC laws in every country we do business and increase our awareness and attention when dealing with or in countries where the risk of bribery and corruption may be higher.

Our Responsibility

All Avient officers, associates, and third parties acting on behalf of Avient are responsible for understanding and complying with this Policy and each of them has an obligation to:

- Be familiar with applicable aspects of the Policy and communicate them to subordinates
- Ask questions if the Policy or action required to be taken in a particular situation is unclear
- Properly manage and monitor business activities conducted through third parties
- Be alert to indications or evidence of possible wrongdoing
- Promptly report violations or suspected violations through appropriate channels

ABAC Laws make it unlawful for any company or person to offer, promise, pay or authorize the payment of anything of value to any individual² to help keep or secure business or obtain some other improper business advantage. This prohibition applies whether the offer or payment is made directly or through another person.

To comply with ABAC Laws, no associate or third parties acting on behalf of Avient should ever offer to anyone, or receive from anyone, directly or indirectly, any form of gift, entertainment or anything of value where that bribe is meant to:

- Obtain or retain business
- Influence business decisions
- Secure an unfair advantage



² This includes any government official and/or private sector employee

ABAC Laws are wide-reaching and can be interpreted very broadly. Violations can occur even if:

- There is no corrupt intent
- The payment, gift or hospitality is only offered or promised and not actually made
- The payment is made but fails to achieve the desired result
- The result benefits someone other than the giver (for example, directing business to a third party)
- If the individual may have suggested or demanded the bribe
- The company feels that it is already entitled to the action or benefit
- When an individual “should have known” that bribery was occurring

What Is a Bribe?

A “bribe” is an offer or promise to give, or the giving of, or authorizing to give, anything of value or another advantage to improperly influence the actions of another person.

Bribes may include:

- Cash and cash equivalents (gift cards or gift certificates)
- Gifts, entertainment and hospitality where is no clear business purpose or they are in excess of reasonable business needs
- Payment of travel expenses or providing vacations
- Paying a government official to ignore an applicable customs requirement or to accelerate a tax refund
- Personal services, favors, loans
- Offers of employment or other benefits to a family member or friend of the individual
- Political party and candidate contributions
- Charitable donations and sponsorships



Other less obvious items can also be a violation. Examples include, but are not limited to:

- In-kind contributions
- Investment opportunities
- Positions in joint ventures
- Favorable or steered subcontracts

The prohibition applies whether an item would benefit the individual directly or another person, such as a family member, friend or business associate.

Bribery of Government Officials

Who is a government official?

A “government official” can be essentially anyone who exercises government authority or who works for or is an agent of a government-owned or government-controlled entity. For purposes of Anti-Bribery Laws, government officials include:

- Officers and employees of a government (federal, state, local), department or agency
- Any person acting in an official capacity for or on behalf of any government, department or agency
- Political parties, political party officials, and candidates for public office
- Officers and employees of government/state-owned or government/state-controlled commercial enterprises, including partially owned entities
- Officers and employees of public international organizations, such as the United Nations

Identifying a government official can often be obvious, but not always. Sometimes, individuals may not consider themselves officials or may not be treated as such by their own governments, but they may still meet the definition of a government official defined above. Avient associates are responsible for determining whether the proposed activity involves a government official and is acceptable and should consult the Legal Department if there are any questions or concerns.

Commercial Bribery

In addition to prohibiting bribery of government officials, Avient also prohibits bribery and corruption in commercial dealings. Associates should never offer or accept anything

of value to/from existing or potential customers, suppliers or other third parties in order to improperly obtain business or an unfair advantage for Avient. Our reputation for integrity is more important than the potential gains to be made in dealing inappropriately with other individuals and organizations.

Facilitation Payments and Kickbacks

Facilitation payments are unofficial fees made to a government official to facilitate (speed up) approval of some type of activity. Facilitation payments blur the lines between legal and illegal as they can be interpreted as bribes. Kickbacks are typically negotiated amounts extracted from the payment of goods and returned to the bribe-taker.

Avient does not offer or accept facilitation payments or kickbacks of any kind to or from government officials, customers, vendors, or other business partners. Associates and third parties should avoid any activity that might lead to or suggest that Avient will make or accept a facilitation payment or kickback. There may be situations where avoiding facilitation payments or kickbacks may put our associate's (or their families') personal security at risk. Under these circumstances, contact the Corporate Ethics Officer (ethics.officer@avient.com) or General Counsel (legal.officer@avient.com) immediately.

Working with Agents, Distributors and Other Third Parties

Avient from time to time may use an agent, distributor, consultant or other intermediary to support its business activities, or may participate with business partners in a joint venture or other business structure. These relationships are important to Avient and provide valuable contributions in many areas of business. They can also pose compliance challenges, so Avient must take appropriate steps to prevent bribery.

Most Anti-Bribery Laws apply whether a bribe is made directly to an entity or through an agent, consultant or other intermediary. Avient as a company, and individual officers and employees, may be held liable for improper payments made by an agent or other intermediary if

there is actual knowledge or reason to know that a bribe will be paid. Willful ignorance—which includes not making reasonable inquiry when there are suspicious circumstances—is not a defense.

For that reason, it is important Avient conducts due diligence on agents and other third parties both before and during the relationship.

Due Diligence and Approval Process

Prior to engaging or renewing an existing agreement with a sales agent, distributor or any other third party, Legal review and approval must be obtained. Contact your Legal partner to request a due diligence review, and ensure you have received written approval prior to working with any agent or third party. Third parties are expected to contractually agree to comply with the ABAC Laws. Some third parties may also be required to complete compliance training.

To minimize risk, Avient must consider certain factors before entering into any third party relationship and all third parties must meet the following standards:

- Reputable—it has the requisite experience and expertise
- Credible—business references support the third party's claims of expertise
- Financially stable—adequate resources to fulfill commitments
- Ethical & legal practices—committed to complying with all applicable laws including anti-bribery laws; and
- Committed—executes an acknowledgement of, and agreement to comply with, this Policy

Red Flags

Avient can also be held liable under ABAC Laws for the actions of our agents and other third parties (including joint venture partners). If you have a reasonable suspicion that an agent or other third party might pay a bribe and do not take appropriate steps to either stop them from making the payment or notify your Legal partner, Avient could be seen as implicitly authorizing the bribe.

Red flags to watch out for include:

- The third party is located or doing business in a country with high levels of corruption
- A customer, supplier, or third party
 - Objects to contractual representations regarding compliance with ABAC Laws
 - Seeks a contract limiting competition
 - Divides a purchase into a group of smaller purchases, to avoid approvals required by government or Avient management
 - Is owned or managed by a government official or someone closely related to an official
 - Asks for off-book or cash adjustments in price
 - Is unwilling to provide details necessary for Avient to perform due diligence
 - A supplier or other third party
 - Requests payment to a personal or offshore bank account
 - Lacks experience with product, field, industry, or qualified staff
 - Objects to a detailed statement of work

Accounting and Record Keeping Requirements

Under most ABAC Laws, Avient and its affiliates must keep accurate and detailed books and records and maintain an adequate system of internal controls. These requirements apply to all of our business activities in all of our locations and are implemented through Avient's standard accounting rules and procedures. All associates must follow these rules and procedures without exception.

Avient does not allow any "off the book" or "slush fund" accounts to be established or used. "Petty cash" funds are also not allowed. Special care must be exercised when transactions may involve payments to government officials. Any payments to government officials should be promptly reported and properly recorded and include the purpose, amount, and other relevant factors. Requests for false invoices or payment of expenses that are unusual, excessive, or inadequately described must be rejected and promptly reported. Misleading, incomplete or false entries in Avient's books and records are never acceptable.

Reporting Possible Violations

Any employee who has reason to believe that a violation of this Policy has occurred, or may occur, must promptly report their concern to any or all of the below resources so that a thorough investigation can be conducted.

- Your supervisor or any Avient manager
- The Corporate Ethics Officer via email at ethics.officer@avient.com
- Avient's General Counsel via email at legal.officer@avient.com
- Any member of the Legal department
- The Avient Ethics Hotline

Avient Ethics Hotline

The Ethics Hotline is available globally in over 20 languages, 24 hours a day, 7 days a week, by phone and through a website. An independent company receives all website and phone reports received by the Ethics Hotline and reports the information to the Corporate Ethics Officer. All reports will be kept confidential to the extent possible. The Ethics Hotline website can be found on avient.ethicspoint.com. You can make an inquiry or a complaint from this website, or by calling the third-party hotline at any of the country specific telephone numbers listed on the website. When reporting any concern involving a payment, please include the following information (to the extent you are aware of these details):

- The amount and purpose of the payment
- The identification and the line of business of the person making the payment
- The circumstances under which the payment was made
- The identity of any person who knows of the payment

Protection from Retaliation

Retaliation in any form against an employee who has, in good faith, reported a violation or possible violation of this Policy is strictly prohibited. Associates who violate this Policy will be subject to disciplinary action, up to and including termination.

Quick Reference: ABAC DOs AND DON'Ts

DO

- ✓ Know that Avient prohibits any form of bribery and corruption and does not allow facilitation payments
- ✓ Be familiar with applicable aspects of our ABAC Policies and communicate them to subordinates and third parties
- ✓ Ask questions if the Policies or actions required to be taken are unclear
- ✓ Promptly report violations or suspected violations to your supervisor, the Legal Department or the Ethics Hotline
- ✓ Know that “value” is not necessarily measured in monetary terms
- ✓ Know that bribes can include the following:
 - Cash and cash equivalents (gift cards or gift certificates)
 - Gifts, entertainment and hospitality where there is no clear business purpose or they are in excess of business needs
 - Payment of travel expenses or vacations
 - Paying a government official to ignore an applicable customs requirement or to accelerate a tax refund
 - Personal services, favors, and loans
 - Offers of employment or other benefits to a family member or friend of the individual who has influence
 - Political party and candidate contributions
 - Charitable donations and sponsorships
 - Other less obvious items include in-kind contributions, investment opportunities and favorable or steered subcontracts
- ✓ Know that the prohibition applies whether an item would benefit the individual directly or another person, such as a family member, friend or business associate
- ✓ Keep books, records, and accounts in reasonable detail, and accurately and fairly reflect the transaction
- ✓ Conduct due diligence on agents, distributors, and other third parties prior to engagement and during the relationship and obtain Legal Department approval
- ✓ Properly manage and monitor business activities conducted through third-parties

DON'T

- x Offer, promise, pay, or authorize the payment of anything of value to any government official and/or private sector employees to help Avient obtain or keep business or secure some other improper business advantage. This prohibition applies whether the offer or payment is made directly or through another person
- x Make misleading, incomplete, or false entries in Avient’s books and records
- x Ignore red flags when dealing with third parties



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