



Human Trafficking and Anti-Slavery Statement For Financial Year 2025

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, the California Transparency in Supply Chains Act of 2010 and the Canada Fighting Against Forced Labor and Child Labor in Supply Chains Act (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.

The entities that are subject to the Canada Fighting Against Forced Labor and Child Labor in Supply Chains Act are: Lyondell Chemical Company; Equistar Chemicals, LP; LyondellBasell Advanced Polymers Inc.; and LyondellBasell Acetyls, LLC (collectively referred to as the "Canada Reporting Entities"). Each Canada Reporting Entity is a wholly owned subsidiary of LYB.

Structure, Activities, and Supply Chains

LYB participates globally across the petrochemical value chain and is an industry leader in many of its product lines. LYB manages its operations through five operating segments: Olefins and Polyolefins-Americas; Olefins and Polyolefins-Europe, Asia, International; Intermediates and Derivatives; Advanced Polymer Solutions; and Technology. In February 2025, LYB ceased business operations at its Houston refinery and discontinued its Refining operating segment.

LYB's chemicals businesses consist primarily of large processing plants that convert large volumes of liquid and gaseous hydrocarbon feedstocks into plastic resins and other chemicals. These chemical products tend to be basic building blocks for other chemicals and plastics, which customers use to manufacture a wide range of products that people use in their everyday lives including food packaging, home furnishings, automotive components, paints and coatings. LYB's discontinued refining business processed crude oil into refined products such as gasoline and distillates. LYB also develops and licenses chemical and polyolefin process technologies and manufactures and sells polyolefin catalysts.

The feedstocks and raw materials used in LYB's businesses are either sourced externally from third parties or from other LYB entities within the corporate group. In addition to feedstocks and raw materials, LYB sites and office locations source technical services and materials, machinery and equipment, corporate services, logistics services, utilities, and IT-related hardware and software from third parties.

LYB primarily operates in industries and countries that are significantly regulated and have robust employment conditions.

Policies and Due Diligence Processes

LYB has adopted the policies and practices described below to prevent and mitigate the risk of forced and child labor taking place in its operations and supply chains.

LYB 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. The Code of Conduct is available in 17 different languages. 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. The LYB Chief Compliance Officer, who has a direct reporting line to the Audit Committee, provides

regular reports to the Audit Committee on compliance with the 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 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, available in 7 different languages, establishes human rights standards for our supply chain in accordance with applicable legal requirements. Compliance with the Supplier Code of Conduct principles is evaluated through suppliers' risk assessments, ratings, sustainability assessments, and audits. Non-adherence with the Supplier Code of Conduct or failure to correct violations may result in LYB taking appropriate steps regarding its relationship with a supplier, which may include suspending or ending the business relationship.

LYB has also established a Global Sustainable Procurement program and 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 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.

Assessing Risk and Auditing Compliance

LYB has implemented the following policies and initiatives to assess risk and audit compliance:

Whistleblower Policy

LYB has implemented anonymous reporting channels for employees and the public through an independent whistleblower helpline and website, EthicsPoint. For EU countries, LYB has adopted an EU Whistleblower Policy setting out applicable reporting procedures and protections for those who raise concerns.

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.

Sustainable Procurement Program Assessments and Audits

The LYB supplier sustainability due diligence process follows a structured, multi-phase approach to ensure responsible sourcing and risk management and consists of the following four phases: setting sustainability expectations, supplier sustainability risk screening, supplier sustainability assessments and audits, and corrective actions and continuous improvement.

LYB suppliers are screened in the EcoVadis IQ Plus platform to understand their sustainability risks by topic, including those related to child and forced labor. Supplier sustainability risk screening considers business relevance, as well as country-specific, sector-specific, and commodity-specific risks to ensure a comprehensive assessment. As of December 31, 2025, LYB has screened over 17,000 suppliers based in 72 countries spanning over 200 industries, representing 93% of LYB suppliers. Most suppliers are based in the U.S., France, Germany and the Netherlands. The 2025 risk screening identified 84 suppliers with very high labor and human rights risk and 723 with high labor and human rights risk. The majority of these very high and high risk suppliers originate from high risk industries and/or high risk countries.

LYB aims to complete supplier sustainability assessments or audits for suppliers that are considered high or very high risk in the risk screening process, as well as key suppliers.

Engagement with high or very high risk suppliers is focused on suppliers with a minimum spend of \$150k per year. A key supplier is defined as a group supplier with greater than \$1 million annual spend in 2024. In 2025, we assessed 74% of key suppliers. LYB uses EcoVadis, a globally recognized sustainability ratings platform that evaluates companies' Environmental Social Governance (ESG) performance, to assess a supplier's policies, actions, and performance across the following themes: Environment, Labor & Human Rights, Ethics, and Sustainable Procurement. LYB also utilizes Together for Sustainability (TfS) audits to gain transparency into sustainability practices at a supplier site. Conducted by TfS-approved audit firms, these on-site audits evaluate key areas such as management practices, environmental impact, health and safety, labor and human rights, and ethical corporate governance. Suppliers are required to address identified sustainability issues through targeted corrective action plans. Ongoing monitoring, capacity building, and supplier engagement drive continuous improvement.

Based on risk screening results, in 2025, LYB conducted 16 audits as part of its audit program, targeting very high and high risk suppliers. Across all audits conducted to date, major findings primarily related to health and safety and labor and human rights. Critical and major findings are addressed through corrective action plans with defined deadlines. If suppliers refuse to allow onsite audits or take corrective action, LYB may terminate the contract and source from an alternative provider. No audits resulted in termination of supplier relationships in 2025.

Salient Human Rights Assessment

In 2025, LYB completed an assessment to identify and prioritize salient human rights issues across our operations, as well as those of our direct and indirect suppliers, and joint ventures. We consider our salient human rights to be those most at risk of severe negative impact, either within our own operations or within our supply chain. Our iterative assessment process, informed by international best practices, involved mapping our business footprint and assessing potential impacts based on severity and likelihood, leveraging on-going stakeholder engagement.

In the assessment process, we considered all internationally recognized human rights, including those related to forced labor and child labor. We identified human rights aspects of health, safety and environmental protection as salient human rights issues in both our own operations and in our supply chain. In addition, we identified fair and just working conditions as a salient human rights issue for supply chain workers.

Effectiveness and Remediation

Through the policies, activities and reporting described above, LYB has not identified any incidents of forced labor or child labor that require additional remediation.

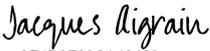
While LYB frequently reviews its policies and procedures, the initiatives listed above represent the current extent of our (1) verification of product supply chains to evaluate and address

slavery, child labor, and human trafficking risks in furtherance of the Acts (LYB is not required to conduct such verifications through third parties); (2) auditing of suppliers to evaluate supplier compliance with LYB 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 products comply with laws regarding slavery, child 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.

Signatures

UK Modern Slavery Act

The above information has been provided as required by the UK Modern Slavery Act and was approved by the Board of Directors of LyondellBasell Industries N.V. on 19 February 2026.

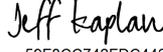

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Jacques Aigrain, Chair of the Board of Directors of LyondellBasell Industries N.V.

Canada Fighting Against Forced Labor and Child Labor in Supply Chains Act

In accordance with the requirements of the Canada Fighting Against Forced Labor and Child Labor in Supply Chains Act, and in particular section 11 thereof, this statement has also been approved by the following individuals on behalf of each Canada Reporting Entity. The below signed attest that they have reviewed the information contained in the report for Lyondell Chemical Company, Equistar Chemicals, LP, LyondellBasell Acetyls, LLC, and LyondellBasell Advanced Polymers Inc., as applicable, and based on their knowledge and having exercised reasonable diligence, the information in the report is true, accurate and complete in all material respects for the purposes of the Act for fiscal year 2025.

LyondellBasell Finance Company


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Jeffrey Kaplan, Director

Date: Feb 24, 2026 | 14:11:33 CST

Signed by:

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Agustin Izquierdo, Director

Date: Feb 24, 2026 | 14:08:59 CST

California Transparency in Supply Chains Act of 2010

No signature required.