



Forced Labor in Canadian Supply Chains Report for Financial Year 2024

LyondellBasell Industries N.V. (together with its consolidated 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. This joint statement is prepared on behalf of Lyondell Chemical Company, Equistar Chemicals, LP, LyondellBasell Advanced Polymers Inc., and LyondellBasell Acetyls, LLC (collectively referred to as the “**Reporting Entities**”) pursuant to The Canada Fighting Against Forced Labor and Child Labor in Supply Chains Act (the “**Act**”). This statement sets out the actions taken to prevent and reduce the risk that forced labor or child labor was used by the Reporting Entities or in their supply chains during the financial year ended December 31, 2024.

Structure, Activities, and Supply Chains

LYB participates globally across the petrochemical value chain and is an industry leader in many of its product lines. Each of the Reporting Entities is a wholly owned subsidiary of LYB. 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 the Reporting Entities’ businesses are either purchased from third parties or supplied from other LYB entities. In addition to feedstocks and raw materials, the Reporting Entities’ 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.

Policies and Due Diligence Processes

LYB is committed to conducting business in an ethical and responsible manner, which includes complying with applicable slavery, forced labor, child labor and human trafficking laws. LYB has adopted, and each of the Reporting Entities is subject to, the policies and practices described below to mitigate the risk of child and forced labor taking place in its operations and supply chains.

LYB Code of Conduct

The LYB Code of Conduct (the “**Code**”) embodies its dedication to conducting business ethically and responsibly by obeying the law and enabling a safe and productive work

environment. The Code forbids the use of forced, bonded (including debt bondage), indentured, or involuntary labor, exploitative prison labor, slavery, child labor, or trafficking in LYB operations. The Code also prohibits: harsh or inhumane treatment of all workers, including actual or threatened corporal punishment; retention of passports or other original employee documents unless required by law and restriction of employee access to such documents; and charging of any fee for employment or any refundable security deposit to be paid for employment purposes. For purposes of employment, LYB defines “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. LYB does not hire people under the applicable mandatory minimum.

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

LYB expects all employees to report possible violations or concerns regarding the Code. LYB offers an independent whistleblower helpline and website, EthicsPoint, that enables anyone to report complaints and violations of law and regulations anonymously. The failure to report any suspected Code violation or misconduct immediately may also be considered a violation of the Code. When an allegation of an employee Code 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 sets forth expectations for 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 expectations for the LYB supply chain, including the Reporting Entities’ supply chains, in accordance with applicable legal requirements. Compliance with the principles in the Supplier Code of Conduct 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 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 the LYB Human Rights Policy.

LYB Human Rights Policy

LYB has adopted a comprehensive Human Rights Policy that sets forth its commitment to respecting human rights throughout its global operations. The Human Rights Policy establishes minimum standards for the following fundamental aspects of human and labor rights: workforce health and safety; prevention of discrimination, harassment and retaliation; workplace security; working conditions and fair wages; freedom of association; freely chosen employment; and child labor protections. The 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, which the Reporting Entities are subject to:

Whistleblower Policy

LYB has implemented a whistleblower policy and enabled 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. 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, related training programs, and complaints received and investigated by the compliance function.

Authorized Economic Operator (AEO) in the European Union

Since 2010, LYB has actively participated in the AEO program in the European Union. AEO is 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.

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.

Sustainable Procurement Program Assessments and Audits

The LYB supplier sustainability due diligence process, which covers the Reporting Entities' supply chains, 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, 2024, LYB has screened over 17,000 suppliers based in 65 countries spanning over 200 industries, representing 71% of key LYB suppliers. Most suppliers are based in the U.S., Germany, France, the Netherlands, and Italy. The 2024 risk screening identified eight suppliers as very high risk and over 700 as high risk. Around 90% of high and very high risk suppliers are raw material suppliers and 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. A key supplier is defined as a group supplier with greater than \$1 million annual spend in 2023. LYB uses EcoVadis, a globally recognized sustainability ratings platform that evaluates companies' ESG performance, to assess a supplier's policies, actions, and performance across the following themes: Environment, Labor & Human Rights, Ethics, and Sustainable procurement. In 2024, LYB introduced IntegrityNext, a cloud-based assessment tool deployed alongside EcoVadis assessments to assess suppliers' sustainability management systems. Lastly, 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.

The LYB supplier audit program completed its first year in 2024. Based on risk screening results, LYB conducted 17 TfS audits targeting high-risk suppliers. Across all audits conducted to date, major findings primarily related to health and safety (e.g., fire safety) and labor and human rights (e.g., working hours). All findings, regardless of severity, are addressed through corrective action plans with defined deadlines. While most suppliers agreed to TfS audits, one security services provider in China, with low EcoVadis scores in labor, human rights, and environmental areas, declined repeated requests for an onsite audit. Due to their lack of engagement, LYB decided not to renew the contract and sourced an alternative provider.

The Reporting Entities primarily operate in industries and countries that are significantly regulated and have modern employment conditions. LYB has conducted a high-level

assessment of its procurement categories and has identified the following supply chains which may have higher inherent risk of human rights issues:

- Manufacture of equipment and machinery;
- Extraction or mining of crude petroleum, natural gas, and metal ores;
- Manufacture of chemical products, fertilizers and nitrogen compounds, plastics and synthetic rubber;
- Mechanically recycled feedstocks;
- Contract labor and facilities services; and
- Shipping, warehousing, and storage

Effectiveness and Remediation

Through the policies, activities and reporting described above, the Reporting Entities have not identified any incidents of forced labor or child labor that require remediation.

While LYB, including the Reporting Entities, frequently reviews its policies and procedures, the initiatives listed above represent the current extent of the Reporting Entities' (1) verification of product supply chains to evaluate and address slavery, child labor, and human trafficking risks in furtherance of the Act (LYB is not required to conduct such verifications through third parties); (2) auditing of suppliers to evaluate supplier compliance with LYB standards regarding the Act (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 the Reporting Entities' 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 Act; and (5) the provision of training for employees who have direct responsibility for supply chain management on this subject matter.

In accordance with the requirements of the Act, and in particular section 11 thereof, this statement has also been approved by the following individuals on behalf of each 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 2024.

LyondellBasell Finance Company

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