

Code of Conduct

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Executive Statement

At Borealis, we're making great progress in transforming our business towards more sustainable activities and implementing responsible and sustainable business behavior throughout the whole organization.

A crucial part of this is defining which values and commitments we hold ourselves and those we do business with accountable to. The new Borealis Code of Conduct 2025 is the result of a careful review of existing company practices and an engaged discussion with our various departments to see where we can do even better.

We now hold in our hands an ambitious document that codifies the values we live by at Borealis and the commitments we make to do our part, especially in those sustainability areas that are most material to us.

We will ensure that every business unit, every employee, every subsidiary, and every business partner of Borealis is aware of and applies our Code of Conduct in practice. Violations shall always be reported and will always be met with consequences.

At last, there is just one more thing to say: when in doubt, please consult our Borealis Code of Conduct – our comprehensive guide on how to move Forward for Good.

The Borealis Executive Board

Purpose of the Code of Conduct

At Borealis, we are continuously working hard to ensure more sustainable and responsible behavior toward employees, the environment, and society. Through both our direct operations and our value chain, our activities have a considerable impact on society, the environment, and the economy. We are therefore committed to conducting our business in a responsible way, respecting the environment, and adding value to the societies in which we operate. We at Borealis are motivated by high ethical standards and apply them in the various aspects of our operations and activities – and we expect all the people collaborating with us to do the same. We have three core Values that underpin all the work we do.

These core Values are further reflected in the specific commitments laid out in this Code of Conduct. The Code of Conduct is designed to help everyone working for, at, or with Borealis act in line with our Values and comply with relevant laws and regulations.

In establishing our commitments to sustainable business behavior, we are guided by recognized best practices and international standards. We ensure we comply with legal and other requirements wherever we operate – or exceed them when they do not meet our standards.

We
care

Considering the impact of everything we do.

We show respect, speak up and act responsibly towards each other, our customers and the environment.

We're
curious

Defining tomorrow by welcoming new perspectives today.

We learn by being inclusive, asking questions, sharing our knowledge and having the courage to try new things.

We
progress

Overcoming obstacles and finding solutions to deliver high performance.

We take ownership, trusting and empowering each other to make bold decisions to deliver safely and at speed.

The commitments laid out in this Code of Conduct are central to how we operate and our continued success. This Code summarizes the specific commitments we have made in our five sustainability focus areas:

Climate Change, which covers our commitments on becoming a net zero business;

Natural Resources Management, which covers our commitments on environmental protection and the circular economy;

Health & Safety, which covers our commitments to keeping our workplaces and processes safe for our employees, contractors, business partners, and all other external stakeholders who may be affected by our activities, as well as the environment;

People & Their Human Rights, which covers our human rights commitments to our employees and external stakeholders;

Ethical Business Practices, which covers our commitments on promoting a strong corporate culture.

Further documents and training are available to ensure that employees and business partners understand these commitments and know how to apply them in practice.



We are guided by international standards for sustainable development. Borealis is a signatory to the United Nations Global Compact (UNGC), which states ten principles in the areas of human rights, labor, the environment, and anti-corruption. They are derived from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and its core treaties, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption. We are committed to upholding the values of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises and will respect them to the best of our understanding and ability in all our business activities. We fully support the goals of the Paris Agreement, and the UN Sustainable Development Goals (SDGs). These international standards further inform the specific commitments laid out in the section "Our Commitments on Sustainable Business Behavior." We expect our business partners to adhere to these same international standards. We encourage our business partners to also participate in such initiatives where applicable.

Scope & Intended Users

The principles of the Borealis Code of Conduct apply worldwide in all our business segments and consolidated subsidiaries to the extent allowed under applicable legal requirements.

Compliance with the Code of Conduct is mandatory for everyone acting on behalf of, with, and for our company. All our employees and business partners,¹ and all other persons acting in the name of Borealis must observe all applicable laws and regulations (including, but not limited to, the German Supply Chain Duty of Care Act) and adhere to our Code of Conduct, or, upon proof of their own adequate regulations in place, to such alternative standards.

Borealis seeks to work with business partners who share and subscribe to our Values and respect our principles, especially in our operations and value chain. Furthermore, we use our collaborations with business partners to embed salient human rights in their business practices and increase their awareness of ethical and ecological standards. We request that business partners also pass these requirements, as applicable, on to their respective business partners, thus ensuring the application of the Values and principles of our Code of Conduct, including ethical behavior, throughout our full value chain.



The Code of Conduct focuses on Borealis' commitments as a company. However, it is up to our employees and business partners as individuals to ensure these commitments are applied in practice. How? By taking the following actions:

Be familiar with the content of our Code of Conduct. Regularly review the Code of Conduct and always ask yourself if your behavior is in line with Borealis' commitments and procedures.

Understand the risks associated with your role and how to manage them.

Seek advice when things are not clear. If you are in any doubt as to appropriate ethical conduct, consult before taking action.

Promptly complete any training assigned to you. Tailored training is available to employees regarding specific situations and how to apply the principles of the Code of Conduct in their daily work.

Speak up and let us know! You should report any suspected violations of the Code or applicable laws. Details on how to report suspected violations are available in the section "Implementing our Commitments: Reporting Concerns."

¹ A business partner is anyone who does business with Borealis on a contractual basis, including but not limited to extractive business partners, JV partners, suppliers and their agents, consultants, sales representatives, dealers, contractors, subcontractors, contract workers, and affiliates.

Our Commitments on Sustainable Business Behavior

Climate Change

Borealis clearly recognizes that climate change is one of the most significant global challenges today and fully supports the goals set forth in the Paris Agreement and the EU climate strategies and targets. By 2050, Borealis aims to transform into a net-zero business for Scope 1 & 2. We are committed to both climate change mitigation and adaptation, and aim to support and accelerate the energy transition.

Specific Commitments:

- » We reduce operational emissions, including by improving operational and energy efficiency. We are committed to switching to cleaner energy in our operations and sourcing renewable energy.
- » We are committed to minimizing the role of voluntary offsetting to reduce our emissions. Only high-integrity, ex-post carbon credit offsets² are acceptable, meaning programs that have already been established and ensure robust carbon offsetting project design, implementation, and validation.
- » We are committed to working with our suppliers and customers to reduce emissions throughout the value chain.
- » We are committed to marketing our products and their emissions reduction potential in an accurate and transparent way and to avoiding misleading statements.
- » We are aware of the social impacts that the energy transition entails. Borealis is committed to contributing to a Just Transition³ for our employees and communities, and to addressing the social and economic effects of the transition on an environmentally sustainable economy.

² According to OMV's standards: carbon credits must represent genuine additional emissions reductions and no double counting is permitted. CO₂ emissions reductions should be maintained over time: unlikely to be reversed and have compensation measures in place in case of unforeseen events (such as forest fires for forestation projects). Minimum social safeguards such as adherence to the OMV Code of Conduct must be ensured for all contractors and the underlying project from which carbon offsets are purchased.

³ "Just Transition" refers to addressing the social and economic effects of the transition on an environmentally sustainable economy as stated in the ILO Guidelines for a Just Transition.

Natural Resources Management

Borealis aims to protect people and nature and to respect planetary boundaries. Borealis is fully committed to applying responsible natural resources management by conducting all activities in an environmentally responsible manner and with the aspiration to cause no damage to the environment. We are also proactively expediting the transition from a linear to a circular economy. We acknowledge and support that in the interest of preserving natural capital and minimizing waste, the conventional linear model of “take-make-waste” must be changed in favor of a circular one.

Specific Commitments:

- » We are committed to implementing prevention and control measures to prevent losses to water and soil and we aim to follow the best recognized industry practices, beyond those provided by authoritative standards and guidance, in the operation of our activities. Any spills shall be assessed and cleaned up promptly after their occurrence to limit their impact on the environment and/or society.
- » We are committed to improving air quality around operational sites to ensure the right of communities to a clean, healthy, and sustainable environment.
- » We are committed to continuously assess and reduce the impact on biodiversity and land and marine ecosystems. We apply the mitigation hierarchy, with priority given to avoidance and minimization over restoration and offsetting. Borealis cooperates with business partners to drive natural resource management throughout our value chain.
- » We respect water as a precious limited resource and focus on its sustainable and efficient use. We respect the right to water of our stakeholders, especially local communities, and minimize the impact of water use (for instance by reducing freshwater withdrawals, especially in water-scarce areas) and discharge (for instance by improving (waste)water quality).
- » We ensure that the management of waste⁴ does not pose a harmful risk to the workforce, local communities, or the environment.
- » Hazardous substances shall be substituted by less hazardous substances where reasonably practicable. To help with this, processes should be designed, modified, and applied to minimize the production and use of hazardous substances, including the production of hazardous by-products or waste and reducing quantities or concentrations for handling and storage.
- » We ensure we are eliminating the use of ozone depleting substances, which are scheduled to be phased out under the Montreal Protocol on Substances that deplete the Ozone Layer.
- » We are committed to addressing plastic pollution, in particular by promoting the circular economy.
- » We are committed to gradually reducing the use of virgin non-renewable resources and increasing the recycled and renewable content in our products.

⁴ We apply the following hierarchy for the management of waste and encourage our business partners to do the same: 1. preventing; 2. preparing for reuse; 3. recycling; 4. other recovery (e.g., energy recovery); 5. disposal in controlled legitimate manner.

Health & Safety

Wherever we operate, we behave with the expressed intention of taking the highest recognized standards for health, safety, and security as our model and with the aim of continually improving our performance in these respects. We are committed to zero harm. We keep our workplaces and processes safe for our employees, contractors, business partners, and all other external stakeholders who may be affected by our activities, as well as the environment.

Specific Commitments:

- » We are committed to eliminating hazards and threats by identifying them and by preventing, controlling, or reducing risks to an acceptable level. We provide training and personal protective equipment to our own employees, while we define required standards for contractors working on our sites.
- » We aim to support our employees in improving both their mental well-being and physical health.
- » We inform relevant local communities about safety risks stemming from our operations, including appropriate communication and procedures in emergency situations. We develop up-to-date safety measures within the Group for use in ecologically sensitive or densely populated areas.
- » We assume responsibility for safety in any outsourced or contracted activities and have established processes that require contractors to work according to our standards.
- » We are committed to training, empowering, and encouraging people to work safely and to investing in technology, programs, and processes to ensure that our facilities and operations are safe for employees, external stakeholders, and the environment.
- » We are committed to advancing sustainable products along the value chain, to giving priority to innovative, value-creating solutions, to identifying substances of concern, and to ensuring the safety of our products for users.
- » We establish effective processes and workflows to ensure our compliance with the EU Regulations on Registration, Evaluation, and Authorization of Chemicals (REACH) and on Classification, Labelling, and Packaging of Substances and Mixtures (CLP). Accordingly, we provide transparent information on our products relating to safety in use, storage, maintenance, and disposal.
- » We strive to minimize the health, safety, environmental, and social impact of our products at any stage in their life cycle following industry best practices.

People & Their Human Rights

Human rights are universal and guide our conduct in every aspect of Borealis' activities. Human rights are inalienable, and every person is inherently entitled to them. We are committed to respecting the human rights of all our stakeholders, including but not limited to employees, business partners, local communities, and consumers. We strive to be one of the best companies to work for and to be a fair and responsible employer that promotes equal opportunities, modern forms of employee development, and a positive and dynamic working environment. We are committed to respecting human rights in our activities, direct surroundings, and in the wider society. Particular focus is placed on those persons and groups with a high likelihood of being in vulnerable circumstances such as children, women, migrant workers, indigenous peoples, and human rights defenders.

Specific Commitments:

- » We respect the right to freedom of association, including the right to form and join trade unions or other employee representation bodies and to engage in collective bargaining. We will not discourage membership of or participation in trade unions and refrain from actions that undermine adequate collective representation. If national law prohibits the establishment of formal employee representation, Borealis seeks to allow alternative forms of adequate representation of employee interests, always within the relevant legal framework.
- » We make every effort to work constructively with employee representatives to achieve mutually satisfactory solutions. This includes collaboration with representatives elected by our employees under local legislation. As far as possible, we will work together to resolve conflicts and strive to promote stakeholder dialogue and involvement.
- » We do not tolerate the use of forced or compulsory labor, human trafficking, slavery, or servitude and ensure that all work is conducted voluntarily, without threat of penalty or sanction, and not based on deception, including ensuring that workers do not pay recruitment fees.
- » We do not employ workers⁵ under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, shall not employ workers under the age of 14. No workers performing hazardous work shall be under the age of 18.
- » We do not tolerate discrimination on any ground such as race, color, sexual identity, gender identity or expression, age, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, indigenous origin, property, marital or family status, disability, health status, including mental health, or any other status.

⁵ This term does not include legally permissible ways of working for minors like modeling for photo shoots' short-term internships, etc.
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We do not tolerate any form of abuse, harassment⁶, or discrimination in any work-related setting. Borealis expects that all work relationships between persons will be business-like and free of explicit bias, prejudice, and harassment.

- » We ensure compliance with locally applicable decent and adequate wage standards, working and rest times, and overtime payment provisions that ensure a dignified standard of living for employees and their families and are in line with the general standards set forth by the International Labour Organization.⁷ Where no sufficient legal protection exists, business partners must ensure at least one uninterrupted day off per week and compensate work at a minimum rate so that employees can meet their basic needs.
- » Regarding parental leave, we comply with national law and ILO Convention 183, which provides for a minimum of 14 weeks of maternity leave.
- » Through Group-wide governance, we ensure a position-based fair and effective reward system that reinforces equal pay for equal work.
- » We ensure a fair and transparent approach to dismissal, sanctions, deductions, and complaints in line with national law and standards of fair proceedings.
- » We are aware that job security represents a major concern not only for the individual employee, but also for society and the region concerned, and therefore we make every effort to meet these responsibilities by means of contingency planning.
- » We respect the rights of access to information, public participation in decision-making, and access to justice. We proactively inform affected stakeholders, such as relevant local communities, of planned and ongoing works and their impacts, as well as mitigation measures being taken by Borealis.
- » We acknowledge indigenous peoples as social groups with identities that are distinct from mainstream groups in national societies and are often among the most marginalized and more likely to be in vulnerable circumstances. We are committed to further addressing any adverse impacts on local culture, religion, customs, traditions, indigenous peoples' rights, legitimate land, or livelihoods in our business activities as well as through our community funding projects.
- » We are committed to community consultation and recognize the principle of free, prior, and informed consent.
- » Borealis recognizes and respects legitimate tenure rights related to the ownership and use of land and natural resources, including water. We are willing to avoid involuntary resettlement and have a zero-tolerance policy for illegitimate land grabbing.
- » In the event of Borealis interference with the rights of relevant local communities, especially those of indigenous peoples, we are committed to developing adequate mitigation, reparation, and compensation plans, in close consultation with all relevant stakeholders, including the host government.

⁶ Harassment is verbal, written, or physical conduct that denigrates or shows hostility or aversion toward an individual that has the purpose or effect of creating an intimidating, hostile, or offensive work environment, has the purpose or effect of unreasonably interfering with an individual's work performance, or otherwise adversely affects an individual's employment opportunities. Harassing conduct includes epithets, slurs, or negative stereotyping; threatening, intimidating, or hostile acts; sexual harassment (unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature); denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace on company time, or using company equipment by email, phone (including voice messages), text messages, social networking sites, or other means. ⁷ A normal working week shall not regularly exceed 48 hours, with the exception of shift work schedules on offshore or otherwise isolated sites, where adequate days off are granted after the accepted work period. Overtime shall be consensual and paid at a premium rate.

- » We aim to build capacity in order to support local development. We also strive to employ people from the countries in which we operate.
- » Borealis recognizes the specific role and vulnerability of human rights defenders. We strongly oppose any threats, intimidation, and physical, verbal, or legal attacks against human rights defenders in relation to our operations.
- » We are committed to respecting human rights and International Humanitarian Law (IHL) while maintaining the security and safety of our staff and operations. We achieve this by acting in a manner consistent with all relevant laws and international standards or initiatives, including the Voluntary Principles on Security and Human Rights (VPs) and the International Code of Conduct for Private Security Service Providers (ICoC). This specifically but not exclusively applies to our interactions with public and private security forces.
- » Prevention and avoidance of the use of force is our priority, implying that means and methods used to protect people must always be chosen based on the risks faced and the local context. We are committed to not wearing, transporting, or storing lethal weapons on our property and we expect our business partners to comply with this commitment while they are on our sites.
- » We engage surrounding communities and consider their security concerns when planning and implementing security-related activities.
- » Borealis recognizes the right to a clean, healthy, and sustainable environment as a human right that is intrinsically linked to a wide range of other human rights. We effectively manage environmental protection as detailed in the section “Natural Resources Management.”
- » We respect the right of everyone to an adequate standard of living for themselves and their families, including adequate food, clothing, and housing, and to continuous improvement in their living conditions. We ensure our employees have access to safe and adequate sanitation facilities including potable water, washrooms, decent food, and, where applicable, adequate housing, food, and clothing, including personal protective equipment, and we request the same from our business partners.
- » We do not use any material derived from conflict minerals, as defined by the EU Conflict Minerals Regulation and Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act, for the manufacturing of our products. Accordingly, we are committed to working with our business partners to ensure that any 3TG minerals (tin, tungsten, tantalum, gold) contained in products and materials supplied to Borealis originate from conflict-free sources.

Ethical Business Practices

Acting ethically and with integrity is part of Borealis' corporate culture and shall guide decision-making at all levels of the organization. Our aspiration is to base the decisions we make every day on the highest ethical standards. After all, trust and integrity are among the most important values a company can possess. We pursue a zero-tolerance policy with regard to bribery, fraud, and other forms of corruption and are committed to respecting and upholding the principles of the United Nations Convention against Corruption, the OECD Anti-Bribery Convention, and all applicable national anticorruption legislation. We take account of the sociocultural norms and business practices in the different countries we operate in, and ensure they are not at variance with our fundamental ethical principles. Borealis believes in sound corporate governance, transparency at management level, and internal control structures to strengthen stakeholder confidence. As a listed company, we are subject to strict regulations.

In addition to this and within our own policies and regulations, our governance goes beyond compliance with laws, including adherence to voluntary standards of conduct and management principles that create a solid basis for trust through sound business ethics, prudence, and integrity. We place strong emphasis on preserving transparency in our Company's management and control structure.

Specific Commitments:

- » Borealis does not tolerate the achievement of results at the expense of violating the law, internal standards, or our ethical values as reflected in the Borealis Ethics & Integrity Policy. All employees are required to act in line with and base their everyday decision-making on the Borealis Group's Ethics & Integrity Policy by acting correctly, with honesty, respect, and fairness.
- » We foster a culture of openness and fairness where employees can voice their concerns. Employees are encouraged to speak up if they see any illegal or inappropriate conduct to avoid any harm being done to others or Borealis.
- » We do not tolerate any form of corruption in our business or business relationships. Borealis complies with anti-bribery and corruption laws in all countries where it operates. Corruption is the abuse of entrusted power for personal gain. Corruption can take many forms including bribery, facilitation payments, or embezzlement. All forms of corruption are prohibited at Borealis. Employees must effectively identify and avoid misconduct related to corruption.
- » Employees must not accept any gifts that could influence the proper performance of their function. The following types of gifts are never acceptable at Borealis: cash or cash equivalents, gifts that are not given or received openly, gifts or invitations that are intended to influence a pending decision process, gifts or invitations that are not in compliance with applicable laws or the terms of this Code of Conduct, or that would cause embarrassment if they were made known to the press or to colleagues. Gifts/invitations, given or received,

which exceed EUR 100 per person, must be registered in the [Borealis Gift register](#).

- » Employees must make business decisions in the best interests of Borealis and not based on personal interests. Employees must avoid situations that could give the impression that their business decisions are influenced by their personal interests. Conflicts of interest must be reported to line management and the Compliance function immediately, filling out the relevant [disclosure form](#).
- » Borealis is committed to fair and free competition. Employees must strictly follow antitrust laws when doing business with competitors, business partners, customers, or suppliers, which in particular includes refraining from discussing commercially sensitive information with any competitor, such as customer pricing, trade margins, volumes, or production capacity. Borealis is also committed to treating its suppliers and customers equally and avoiding any unfair practices in the markets in which it is active.
- » Borealis is committed to preventing money laundering and has restricted cash payments in all areas of its business activities. Furthermore, all transactions should be structured in line with market practice and refrain from using suppliers and service providers that do not make a traceable contribution to the supply chain.
- » Borealis ensures that sanctioned parties (for example by the EU or the United Nations) are not accepted as business partners and transfers the commitment to act in line with international sanction rules to all of its contractual partners.
- » Borealis does not support political parties. Donations⁸ to political parties and their candidates are not allowed, nor are donations to organizations that are not compatible with the terms of this Code of Conduct.
- » Our public policy practices are fully in line with all reporting obligations at national or EU levels, and we are fully compliant with all transparency requirements.
- » We do not tolerate the providing of false and misleading information to internal or external partners.
- » We carefully evaluate our business partners before engaging with them.
- » We avoid any situation that creates a conflict of interest between personal interests and business interests of Borealis.

⁸ A donation is defined as a voluntary, monetary, or in-kind contribution with no reciprocal obligations.

Implementing our Commitments

In this Code of Conduct we have laid down the basic principles that govern all of our actions. We expect and request adherence to these by all of our business partners. Our process management systems and our corporate regulations and directives⁹ constitute the mandatory detailed implementation of Borealis policies. They represent the conscientious translation of the Code of Conduct into practice and form the basis of our monitoring systems. Internal and external audits of our management systems, processes, and data are regularly conducted. We are committed to continuously improving our sustainability management and performance, including by taking steps to prevent and mitigate negative impacts, developing the competence of our employees and business partners on sustainability matters, and providing remedies to affected stakeholders. We report and verify our performance against specific goals, measures, and benchmarks and are committed to transparently reporting on our progress. We are committed to releasing useful and relevant financial and non-financial information in a comparable, verifiable, timely, and understandable manner.

Violations of the Code of Conduct by employees can result in disciplinary action, up to and including dismissal. In some cases, Borealis may report a violation to the relevant authorities, which could also lead to legal action, fines, or imprisonment.

Borealis has implemented appropriate due diligence systems, measures, and ongoing checks to ensure that the spirit and the terms of our Code of Conduct are also applied in practice, including in our operations and value chain. Business partners are expected to implement the same. For instance, we expect and request that our business partners identify and manage their human rights risks and impacts, conduct appropriate training, remedy adverse human rights impacts they are involved in, cascade this due diligence requirement to their own suppliers and contractors, and report on their performance. The measures and controls carried out by business partners are to be documented and submitted to Borealis upon request. We reserve the right to take appropriate measures against those who do not act in accordance with our Code of Conduct or the one applicable under the relevant agreement. Borealis reserves the right to terminate relationships with its suppliers and contractors if issues of non-compliance with Borealis' Code of Conduct (or the one applicable under the relevant agreement) are discovered or non-compliance is not addressed in a timely manner.

⁹ Corporate regulations and directives further detailing the requirements of our Code of Conduct and supporting their implementation include but are not limited to, our GHG Management Framework, Environmental Management Standard, HSSE Directive, Human Rights Management System, People & Culture Ethics Policy, Code of Business Ethics, and Procurement Directive, among others. All regulations and directives can be accessed by employees via our internal platform REAL.

Reporting Concerns

Borealis' good reputation and the trust of its customers and business partners are all based on integrity and compliance with national legislation and regulations. Our employees, partner companies, customers, community members, and other external parties are a valuable source of information and can help to identify misconduct.

If you observe or become aware of an actual or potential case of misconduct or infringement of the commitments in this Code of Conduct, we encourage you to speak up! All incidents will be evaluated in a timely manner and according to internal processes, always within the national legal framework.

How?

For any issues related to corruption and bribery, cartels/unfair competition, capital market law, public procurement, environmental protection, product/food safety and consumer protection, corporate tax regulations, and data protection in particular, you can submit a complaint via the anonymous and confidential [Integrity Platform](#). The Integrity Platform is available to both Borealis employees and external parties.

Whistleblower Protection

Every report received via the [Integrity Platform](#) is treated confidentially and passed on to others only on the basis of strict adherence to the "need-to-know" principle, in case of overriding legitimate interest and only to the extent this is necessary and permitted. Whistleblowers may choose to reveal their identity or remain anonymous. In any case, the whistleblower's identity and all other information that could be used to directly or indirectly deduce the whistleblower's identity are afforded special protection within the applicable national law. This also applies to the identity of the person concerned by a report.

Whistleblowers are subject to special protection against retaliation ("whistleblower protection") by Borealis, as legally provided. Retaliation comprises all actions or omissions in a work-related context that are a reaction to a report and because of which the whistleblower suffers or may

suffer an unjustified detriment. This includes, in particular, detriments with regard to professional advancement, further training, income, or other professional development opportunities, such as dismissal, demotion, denial of promotion, negative performance appraisal, or disciplinary measures. The whistleblower will also have no reason to be afraid of reprisals within Borealis if a report subsequently turns out to be unsubstantiated or it becomes apparent that no violation or misconduct occurred, as long as the whistleblower had reasonable grounds to believe at the time of the reporting that the information reported was true. Similarly, external parties reporting concerns via any of our channels are not retaliated against by Borealis, as legally provided.

Borealis business partners shall, to the extent permissible by law, also have an accessible and effective grievance mechanism (or other mechanism in accordance with the applicable law) in place for their own workers and other stakeholders to report any breaches of human rights, environmental standards, or other matters addressed in this document, and shall prohibit retaliation, as legally provided. Information on the number of grievances (or other input under the mechanism authorized by the applicable law) shall be provided to Borealis upon request.

Data Protection

Borealis respects all relevant international and national data protection laws and applies the highest recognized standards to protect the individual personal rights of all its customers, employees, and business partners. We respect our employees' right to privacy by ensuring that personal data are processed for specified, explicit, and legitimate purposes and are only disclosed or made accessible to third parties in compliance with the legal basis provided for by the applicable legislation and upon concluding the necessary data protection agreements.

Personal data are subject to data secrecy and treated as strictly confidential. They are never kept longer than for the purpose for which they were collected and are protected from unauthorized access or loss. Data subjects not only have the right to information regarding the personal data being processed, but also the right of access, correction, deletion, restriction of processing, data portability, and to object to data processing. They also have the right to lodge a complaint with a supervisory authority.

Questions?

Borealis Group Sustainability is happy to answer any questions regarding the content of this Code of Conduct, the commitments, or what they mean for your work. We are also happy to receive any feedback, comments, input, and suggestions for improvements from both internal and external persons in order to further improve our Code of Conduct and to better achieve our goals.

Contact:

info.sustainability@borealisgroup.com

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Borealis is one of the world's leading providers of advanced and sustainable polyolefin solutions and a European front-runner in polyolefins recycling. In Europe, we are a market leader in base chemicals. We leverage our polymer expertise and decades of experience to offer value adding innovative and circular material solutions for key industries such as consumer products, energy, healthcare, infrastructure and mobility. In re-inventing essentials for sustainable living, we build on our commitment to safety, our people, innovation and technology, and performance excellence. We are accelerating the transformation to a circular economy of polyolefins and expanding our geographical footprint to better serve our customers around the globe. With head offices in Vienna, Austria, we employ 6,900 employees and operate in over 120 countries. In 2021, we generated total sales of EUR 12.3 billion and a net profit of EUR 1,396 million. OMV, the Austria-based international oil and gas company, owns 75% of our shares, while the remaining 25% is owned by Abu Dhabi National Oil Company, or ADNOC, based in the United Arab Emirates (UAE). We supply services and products to customers around the globe through Borealis and two important joint ventures: Borouge (with ADNOC, headquartered in the UAE); and Baystar™ (with TotalEnergies, based in the US).

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