

CORPORATE COMPLIANCE POSITION

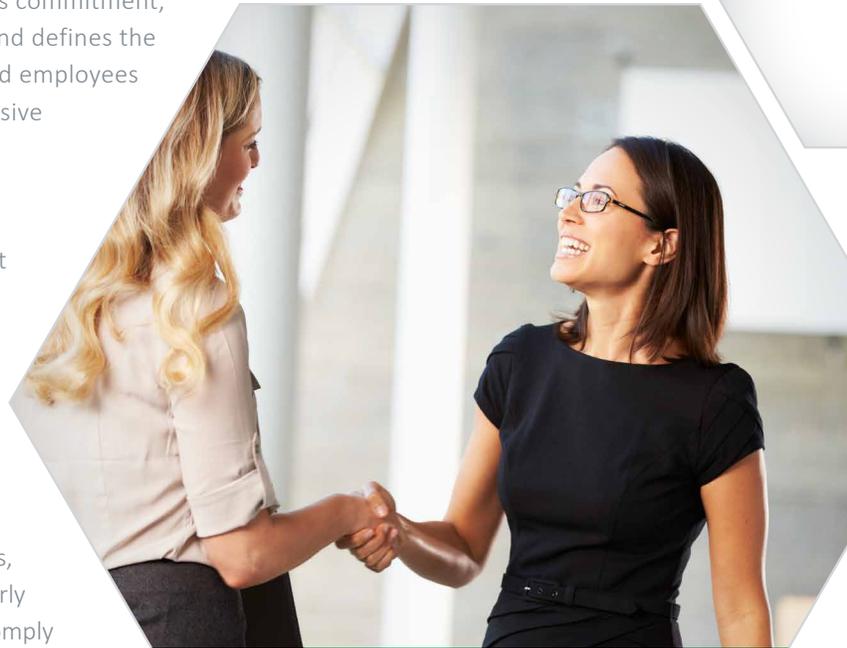
Committed to Ethical Business Practices

Nexeo Solutions, Inc. and its subsidiaries and affiliates (“Nexeo Solutions”) are firmly committed to conducting business throughout the world in accordance with the highest legal and ethical rules and principles. Safety and compliance are at the very foundation of everything we do. We are focused on setting an example of model corporate citizenship for our employees, customers, suppliers and stakeholders. We have established a comprehensive Corporate Compliance Program, including formal governance, documented policies, grievance and reporting mechanisms, and required employee training to permeate all aspects of our business and guide our daily conduct.

A foundation of our Corporate Compliance Program are our Global Standards of Business Conduct (“GSBC”) available on our website which serve as the cornerstone of our company’s commitment, set the principles for our actions and behavior and defines the expectations for all our executives, managers and employees with regard to legal, ethical, respectful and inclusive practices and behaviors.

GOVERNANCE

Under the direction of our Executive Vice President and Chief Administrative Officer, our Legal and Compliance team manages our Corporate Compliance Program to ensure that all employees are properly educated and reporting mechanisms for compliance concerns are readily available. Our Risk Committee coordinates and oversees our enterprise risk management (ERM) system to ensure that key risks, including strategic and operational risks, are properly monitored and mitigated and business activities comply with applicable laws or applicable regulations. We maintain and manage formal grievance and confidential reporting mechanisms, including a 24/7 hotline, which enables any individual to report concerns, such as safety and compliance, without fear of retaliation, of association or other human or labor rights violations. We do not tolerate discrimination on the basis of race, color, religion, disability, national origin, age, sexual orientation, gender, gender identity and expression, marital status, citizenship status or any other characteristic of diversity.



We believe in setting an example of model corporate citizenship for our employees, customers, suppliers and stakeholders.



FINANCIAL ETHICS, ANTI-CORRUPTION AND ANTI-BRIBERY

We insist that our executives, managers and employees act ethically, honestly and with integrity when conducting business for Nexeo Solutions. This includes full, fair, accurate and complete disclosure of financial reports, acting in good faith and with due diligence, and avoiding potential conflicts of interest or relationships. In addition to our GSBC, employees are guided by our Financial Code of Ethics which outlines expected behaviors and compliance procedures.

Under U.S. and foreign anti-corruption laws and regulations, it is prohibited for anyone (including contractors, consultants or distributors) to offer, pay, promise to pay, accept, agree to accept or authorize giving of any money or anything of value, directly or indirectly, to or from anyone, in order to secure or maintain a business or other advantage. Even an appearance of such behavior can be damaging to the organization and the individuals involved.

ANTI-TRUST

We are committed to compliance with the anti-trust laws of the United States, competition laws of the European Union and similar laws of the other countries where we do business. Employees are restricted or prohibited by anti-trust and competition laws from bid rigging, price fixing, agreeing with competitor to restrict output, allocating markets, setting illegal vertical restrictions, engaging in resale price maintenance, boycotting, tying, creating below-cost and predatory pricing, etc. Our employees receive anti-trust training and live support from our compliance team to assist them in making the right decisions in the marketplace.

SUPPLIER CODE OF ETHICS

As a distributor, we believe that long-term, trusting partnerships and collaborative relationships with our suppliers are founded in a shared set of values and standards, enabling us to achieve sustainable business growth. Nexeo Solutions, therefore, aims to ensure that our direct and indirect suppliers, vendors, sub-contractors, distributors, consultants and advisors adhere to certain standards of ethical conduct in the business activities they perform on our behalf. We have collected this set of ethical and responsible expectations in our [Supplier Code of Ethics](#) which defines the standards, practices and behaviors we expect of each supplier.

A full listing of our compliance policies and public statements are available on our [website](#).

