HOW WE DO BUSINESS MATTERS.

INTRODUCTION

HOW WE ACHIEVE SUCCESS

At Celanese, our values position us for growth and a sustainable future – because how we do business matters. Celanese achieves success with honesty, integrity, and strict adherence to applicable laws.

Celanese Corporation (together with its subsidiaries, “Celanese”) expects all of its suppliers, customers, contractors, agents, distributors, and other third-party business partners (“Third Parties”) to share Celanese’s commitment to maintaining the highest ethical and legal standards. This Code is designed to ensure that Third Parties are aware of Celanese’s expectations of them with regard to critical areas of corporate responsibility.

SCOPE

Each Third Party must integrate these standards into its business dealings with and for Celanese and communicate these standards to its relevant personnel. If Third Parties engage subcontractors in connection with work performed for Celanese, Third Parties are responsible for communicating this Code to its subcontractors and ensuring their compliance with this Code.
1. ETHICAL BUSINESS PRACTICES

Celanese treats Third Parties how we wish to be treated — honestly and fairly. Our shared commitment to these ethical standards, along with our quality solutions and services, is how we create and deliver value together.

Anti-corruption. It is Celanese’s policy to comply fully with all applicable anti-bribery and anti-corruption laws, including the United States Foreign Corrupt Practices Act, as amended, and all applicable anti-bribery and anti-corruption laws in the countries where Third Parties may be located or do business with or for Celanese (collectively, “Anti-corruption Laws”). Third Parties must also strictly comply with all applicable Anti-corruption Laws.

When doing business with or for Celanese, Third Parties may not:

- directly or indirectly pay, offer, or give anything of value to anyone (including government officials or private parties) for the purpose of obtaining any improper business advantage or improperly influencing any decision or action;
- make, direct, or permit any facilitation payment; or
- take any action that would cause Celanese to be in violation of any Anti-corruption Law.

Gifts & Entertainment. Celanese recognizes that reasonable and appropriate gifts and entertainment can foster goodwill in business relationships. However, Third Parties should not offer anything of value to Celanese employees that could create improper influence. Any gifts, meals, entertainment, or travel offered to or by any Celanese employee must be reasonable in light of the business relationship and compliant with the guidelines in Celanese’s Anti-corruption Policy, available at http://acp.celanese.com.

Antitrust. Third Parties must compete fairly and honestly in the market and conduct their business activities in compliance with all applicable antitrust laws. Third Parties should avoid commercial practices that constitute unfair competition, such as price fixing, unethical or unlawful competitive intelligence gathering, or abuse of market power.

Conflicts of Interest. Third Parties should avoid or immediately disclose any potential, perceived, or actual conflicts of interest in its dealings with Celanese. Conflicts of interest may arise when personal benefits or relationships could influence the judgment and actions of Third Parties and/or Celanese employees when conducting Celanese business.
At Celanese, we realize that our success depends on the skills and strengths of our people. We expect Third Parties to share our commitment to the principles of diversity, inclusion, equal opportunity, respect, and dignity.

**Equal Opportunity.** Third Parties will not discriminate against any person on the basis of race, color, religion, gender, national origin, sexual orientation, age, gender identity or expression, medical condition, physical or mental disability, veterans’ status, marital status, family leave status, or any other protected class of personal characteristic.

**Diversity.** Third Parties are encouraged to have an active diversity program. Third Parties will support Celanese’s diversity program by providing information requested by Celanese regarding diversity in Celanese’s supply chain.

**Respectful Workplace.** Third Parties are expected to promote and provide workplaces that are free from harassment or discrimination, where employees can work safely and comfortably.

**Labor Laws.** Third Parties will comply with applicable labor laws, including applicable laws relating to ages of employees, minimum wages, and hours and overtime regulations.

**Freedom of Association and Collective Bargaining.** Third Parties will respect the rights of employees to lawfully associate or not associates with groups of their choosing, and will not obstruct any legal rights that its employees may have to collective bargaining.

**Involuntary and Child Labor.** Third Parties will not use child labor, or any form of involuntary, forced, or compulsory labor, including prison labor, slave labor, or labor connected to human trafficking. Third Parties will not knowingly engage in business with any individual or company that uses any child or involuntary labor.
Celanese expects Third Parties to share our commitment to protecting the environment, preserving the health and safety of people and communities, and assuring safe operations.

**General Compliance with Law.** In connection with all aspects of their business dealings with or for Celanese, Third Parties must comply with all applicable federal, state, county, local, municipal, foreign, international, multinational, or other constitution, laws, statutes, treaties, rules, regulations, ordinances and codes.

**Health & Safety.** Third Parties must maintain and operate safe and healthy workplaces, minimizing hazards to their employees and taking all appropriate actions to eliminate workplace-caused injuries or illness.

**The Environment.** Third Parties must comply with all applicable laws and regulations related to the protection of the environment, and maintain current and proper licenses, permits, and registrations to the extent required for their operations.

**Sustainable Future.** Third Parties should continuously improve their environmental performance by working to:

- minimize adverse impacts to the environment in connection with their business activities;
- minimize, reduce, reuse, and recycle their produced waste;
- reduce emissions and releases that negatively impact the environment or human health; and
- increase efficiency in use of resources like water, energy, and other raw materials.

**Management Systems.** Third Parties should maintain appropriate management systems to ensure compliant and responsible operations in relationship to health, safety, and the environment.
To work collaboratively with Third Parties, it is critical that Celanese trusts Third Parties to be good stewards of Celanese’s information and assets.

**Personal Data.** When collecting, using, storing, or otherwise processing personal data, Third Parties will comply with all laws and regulations applicable to the processing of personal data. Each Third Party will take all appropriate measures to protect and secure personal data in its possession. Third Parties shall immediately report to Celanese any data breaches involving personal data of Celanese personnel or other personal data provided by Celanese.

**Confidential Information.** Third Parties will protect and keep confidential any non-public Celanese information, including financial information, employee information, trade secrets, commercial information, and business plans. Third Parties will not disclose any such information without prior authorization from Celanese and will use such information only for Celanese’s legitimate business. Third Parties will take adequate steps to prevent the misuse, abuse, theft, and wrongful disclosure of Celanese’s confidential information.

**Intellectual Property.** Third Parties will not use any Celanese intellectual property other than pursuant to, and in accordance with, express written authorization by Celanese.

**Financial Integrity.** Third Parties must maintain proper and accurate accounting records and financial documentation relating to transactions, expenses, and other business activities connected to Celanese, in accordance with applicable accounting principles, laws, and regulations. Third Parties should also maintain appropriately detailed supporting documentation and provide such documentation to the extent requested by Celanese.
5. REPORTING CONCERNS

Celanese holds its own employees to the same standards of behavior set out in this Code. If you are aware of any behavior by a Celanese employee that is inconsistent with these standards, or that is otherwise unethical or illegal, we encourage you to report it.

**The Ethics Helpline.** You can report concerns using our Ethics Helpline:

1.866.384.4223 (866-ETHIC CE)

For international dialing, or to make a report online, please visit [http://bcp.celanese.com/#1/helpline](http://bcp.celanese.com/#1/helpline). All Ethics Helpline reports are confidential and can be made anonymously.

**Direct Reporting.** You can also report concerns by reaching out to us directly.

By email: compliance@celanese.com

By mail: Celanese Corporation  
222 W. Las Colinas Blvd. Suite 900N  
Irving, Texas, USA 75039  
Attention: Chief Compliance Officer

We take all compliance concerns seriously, and we do not tolerate retaliation for raising concerns in good faith. The relationship between Celanese and its business partners will not be affected by an honest report of illegal or unethical behavior.

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Celanese reserves the right to audit Third Parties’ records for compliance with the standards set out in this Code, and to terminate its relationship with any Third Party without liability to Celanese in the event of a material breach of any provision set forth herein, including any breach of the anti-corruption provisions set out in Section 1.

This Code is based on the principles reflected in Celanese’s own code of conduct, the Celanese Business Conduct Policy. To review the Celanese Business Conduct Policy and other Celanese compliance policies, please visit [http://compliance.Celanese.com](http://compliance.Celanese.com).