

Celanese Corporation

THIRD PARTY CODE OF CONDUCT



HOW WE DO BUSINESS TOGETHER MATTERS.

INTRODUCTION

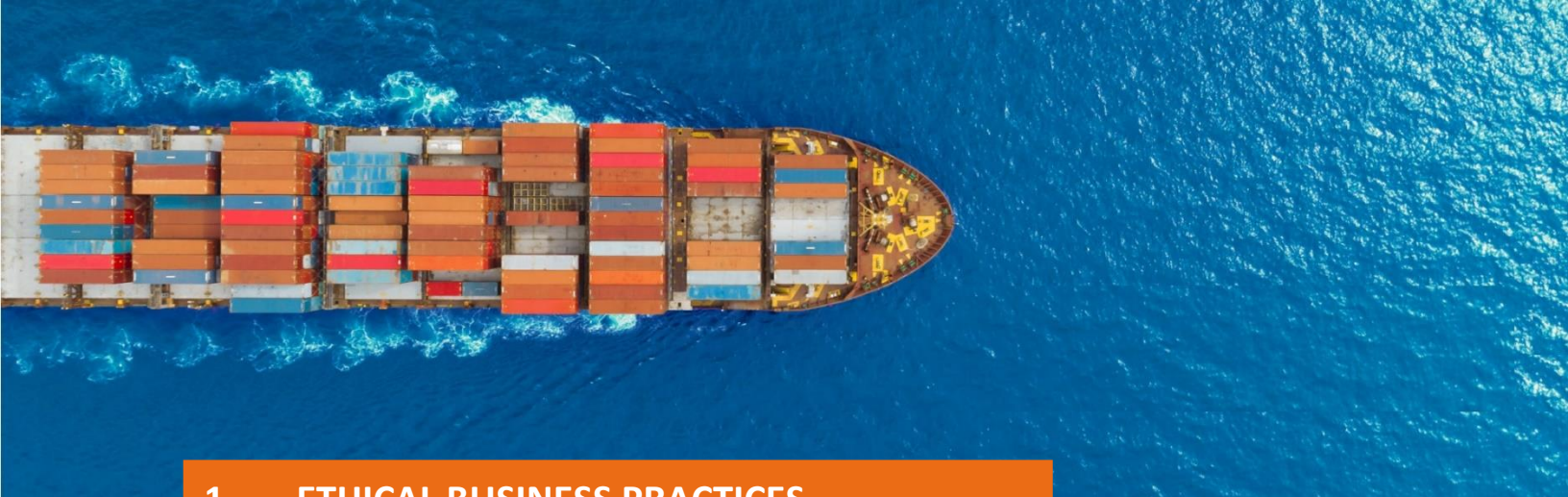
HOW WE ACHIEVE SUCCESS TOGETHER

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**”) strives to share its ethical and legal commitments with third parties doing business with and for Celanese. This Code is designed to make such third parties aware of Celanese’s expectations of them with regard to critical areas of corporate responsibility.

SCOPE

These standards apply to third parties working for or with Celanese or providing goods or services to Celanese (in such capacity, referred to herein as “**Third Parties**”). Each Third Party is advised to communicate these standards to its relevant personnel, as well as any subcontractors engaged by such Third Party in connection with work performed for Celanese.



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**”). When doing business with or for Celanese, Third Parties are expected to strictly comply with all applicable Anti-corruption Laws.

When doing business with or for Celanese, Third Parties should 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 should 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. In connection with business activities for or on behalf of Celanese, Third Parties are expected to compete fairly in the market and conduct their business activities in compliance with all applicable antitrust laws.

Conflicts of Interest. Third Parties should avoid or immediately disclose any potential, perceived, or actual conflicts of interest in its dealings with Celanese or its employees. 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.



2. LABOR & HUMAN RIGHTS

At Celanese, we realize that our success depends on the skills and strengths of our people. We expect Third Parties to respect our commitment to the principles of diversity, inclusion, equal opportunity, respect, and dignity.

Equal Opportunity. Celanese expects that, in connection with their business dealings with Celanese, 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. We encourage our Third Party suppliers of goods and services to have an active diversity program, and to support Celanese's diversity program.

Respectful Workplace. We expect that, in connection with providing goods or services to or for Celanese, Third Parties will promote and provide safe workplaces that are free from harassment or discrimination.

Labor Laws; Collective Bargaining. We expect that, in connection with providing goods or services to or for Celanese, Third Parties will comply with applicable labor laws, including applicable laws relating to ages of employees, minimum wages, and hours and overtime regulations, will respect the rights of employees to lawfully associate with groups of their choosing, and will not obstruct any legal rights that their employees may have to collective bargaining.

Involuntary and Child Labor. We expect that, in connection with providing goods or services to or for Celanese, 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. We also expect Third Parties not to knowingly engage in business with any individual or company that uses any child or involuntary labor in connection with any goods or services provided to or for Celanese.



3. SUSTAINABILITY

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, we expect Third Parties to 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. We expect that, in connection with providing goods or services to or for Celanese, Third Parties will maintain and operate safe and healthy workplaces, minimize hazards to their employees and take all appropriate actions to eliminate workplace-caused injuries or illness.

The Environment. In connection with all aspects of their business dealings with or for Celanese, we expect Third Parties to 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. We encourage Third Parties to 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. We expect that, in connection with providing goods or services to or for Celanese, Third Parties will maintain appropriate management systems to ensure compliant and responsible operations in relationship to health, safety, and the environment.



4. COLLABORATION

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 in connection with business activities with Celanese, we expect each Third Party will comply with all laws and regulations applicable to the processing of personal data and take all appropriate measures to protect and secure personal data in its possession. In the event of any data breaches involving personal data of Celanese personnel or other personal data provided by Celanese, we expect to be immediately notified.

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

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

Financial Integrity. We expect Third Parties to 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. We further expect Third Parties to maintain appropriately detailed supporting documentation and that they will provide such documentation when 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/#!/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 terminate its relationship with any Third Party in its sole discretion without liability to Celanese in the event of any noncompliance with this Code, 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>.



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POLICY EFFECTIVE APRIL 22, 2020.