



Working
together

Working Right

B U S I N E S S C O N D U C T P O L I C Y



Why working right matters

Working together, we are building a winning culture for the future of our Company. Our vision, mission and corporate strategy are the building blocks of a new Celanese. And you are the foundation of our success.

To truly realize our vision we must also define how we conduct ourselves. Regardless of our location, business or region, we always subscribe to the same standards of integrity, honesty and compliance with the law. When we do this, we are united and are able to make a positive impact in our communities, with our customers and with each other. Working Right serves as our guide for how to work responsibly and avoid unintended or costly mistakes.

We're in this together – one Celanese – taking care of one another and building a more responsive and empowered organization. I encourage you to be open, and to have candid dialogue with colleagues and supervisors when you see risks that could prevent us from achieving our vision. The best way for us to remain in compliance is with good communication and involving others as appropriate.

We've made a lot of changes at Celanese in the past year. Our culture is becoming more inclusive, collaborative and open. Let's continue this by working together, working right and making Celanese better every day.



Mark Rohr

CHAIRMAN
AND CHIEF EXECUTIVE OFFICER



I encourage you to be open, and to have candid dialogue with colleagues and supervisors when you see risks that could prevent us from achieving our vision.

— MARK ROHR,
CELANESE CHAIRMAN AND CEO

Our Vision

Be the first-choice
chemistry solution
source for our customers



“When we are working together and working right, we each take personal responsibility for acting ethically and in compliance every day.”

—ASHLEY DUFFIE,
CELANESE CHIEF
COMPLIANCE OFFICER

How we work together

When we are working together and working right, we each take personal responsibility for acting ethically and in compliance every day. We truly believe that ethics and compliance are not the job of any one function. They are owned by all of us – we are all ethics advocates.

This guide incorporates our new values and reflects our more open and collaborative culture. The topics are grouped to align with our values, though many topics support multiple values. The guide describes why the topics covered are important and provides Empowering You tips to better understand how we can act ethically and in compliance.

Our commitment to ethics and compliance is the bedrock of the Company's reputation for integrity. If you have questions or concerns about compliance risks, raise them – your voice matters. Our best resources are often our supervisors who can help resolve many issues and escalate more serious ones. There are also other channels available, including the Celanese Ethics Helpline, which can be used confidentially or anonymously. To encourage candid and open dialogue, we all must respect the importance of our Non-Retaliation Policy.

Over the past year there have been many changes at Celanese, but our commitment to compliance has never wavered. If we talk openly about compliance risks and learn from each other, we will succeed by working together and working right.

A handwritten signature in black ink that reads "Ashley Duffie".

Ashley Duffie
CHIEF COMPLIANCE OFFICER



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Making a difference by **Working**

We are all responsible for creating the right environment to ensure we are working right. Be collaborative, exhibit transparency and engage in candid dialogue. Your voice matters.

Our responsibility to ourselves, each other, and our Company:

- build respect, integrity and ethical behavior
- follow all laws, regulations and our policies
- live our Company values
- seek advice, raise concerns
- protect our Company's financial integrity and reputation
- take care that personal interests do not interfere with our Company loyalty
- ensure that third parties we engage follow these standards



Together and Working Right

Those in a position of leadership have additional responsibilities which include:

- exemplifying and promoting our values
- providing guidance for the expectations set out in Working Right
- creating a positive, collaborative environment where employees feel comfortable seeking advice and raising concerns
- taking appropriate action once aware of possible unethical behavior or violations of law
- safeguarding the confidentiality of those who raise a concern in good faith and protecting them from retaliation

Our reputation is built upon the activities of everyone who acts on behalf of our Company. All directors, officers and employees of Celanese, its consolidated subsidiaries and any affiliates in which the Company has a controlling interest must comply with Working Right and these guidelines in conducting their Celanese activities.



We are all ethics advocates

EMPOWERING
YOU

Each of the individuals listed below is uniquely qualified to assist you with Compliance concerns.

- **Your Supervisor** understands your role and is in the **best position to offer support and advice**. We encourage you to use your supervisor as your first resource when possible.
- **Our Celanese Leaders** can provide advice and recommendations on a course of action and are available to **get you appropriate resources** where required. This resource is always available to you if you feel your concerns have not been adequately addressed.
- **Your HR Partner** can provide valuable **advice on various employee matters** and can help you get the resources or information you need.
- **Our Chief Compliance Officer** administers Celanese's Compliance and Ethics Program and **interprets this Business Conduct Policy**. The Chief Compliance Officer is also responsible for investigating concerns and reporting to our Board of Directors.
- **The Ethics Helpline** is always available to raise your compliance concerns **confidentially or anonymously**.

Most issues

are best handled locally because people at your location or in your function are more likely to be familiar with circumstances, procedures and resources available. However, the Ethics Helpline is always an option.

ETHICS HELPLINE  

1-866-384-4223

(866-ETHIC CE)

GLOBAL: <https://www.compliance-helpline.com/CelaneseBCP.jsp>

EUROPE: <https://www.compliance-helpline.com/CelaneseEU.jsp>



YOU CAN
TALK
TO ME

**Compliance is owned
by all of us and is best served
by open, two-way dialogue.
Remember we are all
ethics advocates!**

However, if you sense that an issue raised locally is not being adequately addressed, you should raise it to higher levels of management or our Ethics Helpline.

Of course, some compliance issues can result in serious consequences to the Company and our employees including:

- attempted bribes
- price fixing
- failures of financial integrity

Therefore, in addition to voicing more material issues to a local resource, employees must also contact the Chief Compliance Officer or the Ethics Helpline.

We all deserve to work for a company we can be proud of. There can be consequences to ourselves, our Company and its reputation if we do not follow laws and our Company's policies. Individuals who are aware of serious violations but do not report them, may be held responsible. Disciplinary actions, which may impact bonuses and raises, may include verbal or written warnings, performance improvement plans or termination of employment.

Celanese Non-Retaliation Policy

Celanese will not permit retaliation for providing information regarding any conduct which you reasonably believe constitutes a violation of Working Right or any applicable law or for participating in an investigation.

IS IT OKAY?

Q: "I have an open job position that interacts with our major client. Our client prefers working with men. Can we exclude all female applicants?"

A: Celanese is committed to creating an environment reflecting the diversity of the communities in which we do business. Denying employment opportunities to a person because of their gender, national origin, race, religion or a disability is prohibited.

Employee growth

Our Company realizes that success depends on the skills and strength of every employee. Celanese is committed to the principles of equal opportunity and creating a working environment in which diversity is accepted and valued.

Equal opportunity

Everyone benefits from a respectful workplace. By working right we:

- treat every employee with fairness and respect
- never discriminate against or harass each other
- consider individuals for employment opportunities on the basis of legitimate, non-discriminatory factors, including skills, knowledge, experience and job performance
- ensure that all employees, regardless of job title or level, will be afforded fair treatment in matters affecting promotion, training, hiring, compensation and termination that is lawful and consistent with our human resource management system, policies and processes

CELANESE AT WORK

**Our new Qorus™
sweetener system assists
food and beverage
manufacturers to balance
sweetness and flavor with a
pure authentic taste.**





MA YONGFANG,
NANJING

WHAT
SHOULD
I DO



Q: “I am a supervisor of a diverse team, and at staff meetings I don’t always feel like my team is comfortable discussing concerns or challenges they may encounter. What should I do?”

A: As an important step in living our value of collaboration, supervisors must build a collaborative and trusting workplace where employees feel open to raise concerns. Keeping the “Empowering You” tips on this page in mind will help you and your team members ensure that everyone’s voice matters.

EMPOWERING YOU

Every employee should feel comfortable raising difficult issues. Here are some tips that may help:

- assume good faith
- be respectful
- be open
- listen actively
- consider your tone
- use clear messages
- avoid exaggerations

Leaders should encourage an environment that invites open dialogue. In our safety programs, all leaders and employees affirmatively invite one another to tell them if they are taking any unsafe actions. Similarly, leaders and team members also want to avoid undue risks, and should invite one another to openly discuss any issues or concerns.

IS IT OKAY?

Q: “Another employee is harassing a co-worker who is afraid to complain about it. What should I do?”

A: Harassment can have a very demoralizing effect on the victim and their co-workers. We will not tolerate harassment. Either the co-worker or you should raise the situation to a supervisor or Human Resources. The Ethics Helpline is always an option. The Company will handle the report confidentially and will not permit any retaliation against either you or your co-worker.

Harassment

We all deserve to work in an environment that embraces the Celanese values. By working right we ensure a workplace that is fair and respectful.

- We promote and provide a harassment-free environment where violent, intimidating or other harassing behaviors are not tolerated.
- We insist on a workplace free from sexual harassment, unwelcome sexual advances, demands or other unwelcome communications or conduct of a sexual nature.
- We safeguard employees from retaliation when they raise issues or concerns in good faith.

Substance abuse

- Because safety is a precondition for everything that we do, we are committed to a workplace free from substance abuse.



CELANESE AT WORK

Our EVA polymers and high-performance engineering polymers are used in solar energy applications, including solar panels, housings for solar collectors, optical lenses, insulation and piping.

WE CAN IMPROVE THE WORLD

Grant Proulx of Clear Lake shares his enthusiasm for chemistry with local school children.



EMPOWERING YOU

At Celanese, people matter, as demonstrated through our commitment to employee development. We all can help create a winning culture when we remember these tips:

- take care of each other
- give trust
- openly discuss concerns
- raise difficult issues
- foster employee growth

Employment agreements

Celanese will respect binding agreements employees may have with their prior employers. Upon accepting a Celanese position, or when transferring to a new responsibility within the Company, you should notify your supervisor if you are subject to any agreements with prior employers, such as confidentiality, non-compete and non-solicit agreements.

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RETALIATION IS PROHIBITED.

Resources

- Equal Employment Opportunity Statement
- Non-violence Policy
- Respect and Dignity Policy

IS IT OKAY?

Q: “A government official that administers Celanese permits asked if we would hire his niece as a favor. Can I hire his niece?”

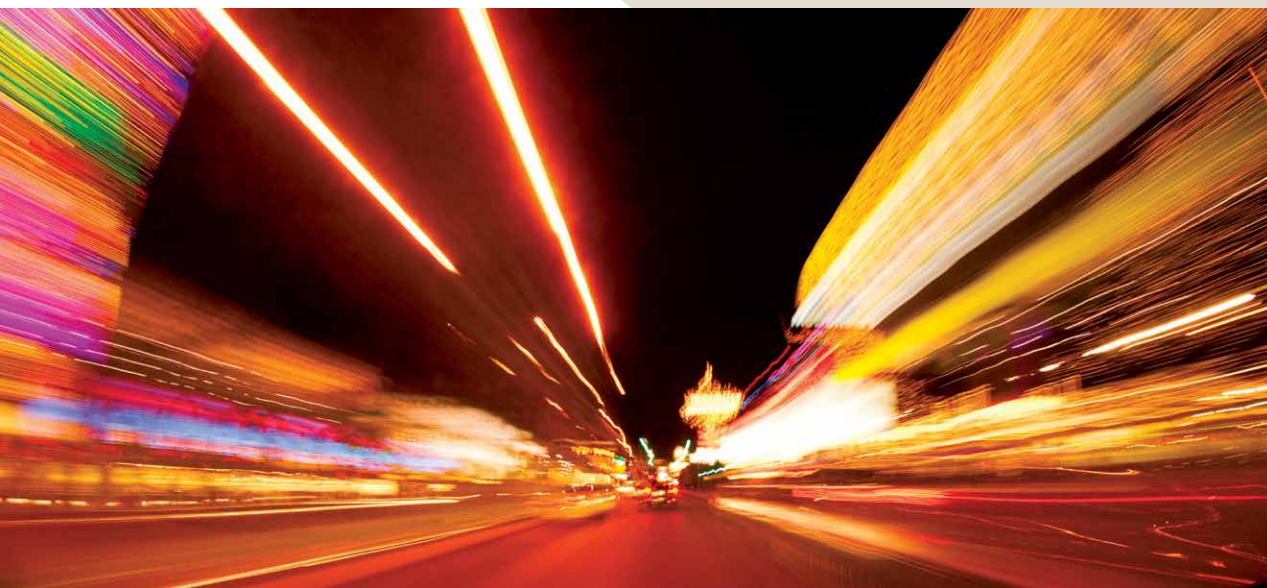
A: You should not hire the niece because this could be considered as a bribe intended to influence the government official's actions.

Customer value

Our vision is to be the first-choice chemistry solution source, therefore we will deal fairly with our customers and suppliers.

We will base our competitive appeal on the quality of our products, competitive price, the services we provide and the competence and honesty of our product and sales presentations. Our suppliers are selected on the basis of objective criteria such as capabilities, quality, compliance, integrity, reliability, competitive pricing and suitability of product and service.





Anti-Corruption

At Celanese we are serious about conducting our business in a manner that is free from corruption. No business is worth damaging our reputation in the marketplace or compromising our values. By working right we ensure compliance with all laws, and we help prevent corruption from happening wherever we do business.

- We will not make payments, give gifts or offer anything of value to governmental officials, directly or indirectly, with the intent to influence such officials.
- Laws define “government officials” broadly as including employees and others acting in an official capacity at all levels of any government organization, employees of a state-owned entity (even purely commercial businesses owned by government agencies), and candidates for office and political party officials. Prohibitions that apply to government officials also apply to their family members.
- If Company policy prohibits a payment, we may not use our own funds for the expense nor ask a third party to make the payment.
- Because Celanese is a U.S. corporation, all of our subsidiaries and employees globally must comply with the U.S. Foreign Corrupt Practices Act (FCPA) as well as local anti-corruption laws.
- Facilitation payments (a tip or nominal payment to a government official to expedite performance of non-discretionary government actions) are prohibited.

CELANESE AT WORK

Celanese is helping to meet the world's increasing demand for liquid transportation fuel with its innovative TCX® Technology. This technology uses basic hydrocarbons – not food crops – as feedstock in the production of fuel ethanol.

CELANESE AT WORK

Celanese plays a vital role in the manufacture of paints with products from our Intermediate chemistry and Emulsion polymers businesses. EcoVAE® vinyl acetate / ethylene emulsions enable paint to be low odor and eco-friendly.

IS IT OKAY?

Q: “In my country, it is common practice to give gifts to government officials when you first meet with them, although this is officially prohibited. Even though the government is not enforcing the law, should I still be concerned with it?”

A: Yes. Compliance with the law is the right thing to do and results in better business practices and government and community relations.

- Except in limited circumstances outlined in our Anti-Corruption Program information, we will obtain pre-approval for gifts, hospitality or travel provided to government officials.
- Gifts and entertainment that foster good will in business relationships may be exchanged, but we must not commit commercial bribery by making any unlawful payment or provide excessive or inappropriate entertainment or travel to any vendor or customer.
- We must always maintain accurate books and records regarding Celanese gifts and entertainment.
- We will conduct due diligence prior to entering into agreements with agents, consultants or other business partners. Then, carefully review expenses to ensure our payments are not used to pay bribes.



EMPOWERING YOU

Competition

Competition (antitrust) laws promote open competition and protect competitors and customers from unfair business practices. Celanese is committed to engaging in fair competition in compliance with these laws. We compete vigorously and ethically, we are customer-focused, and we do not induce our customers to provide us with confidential information regarding our competitors.

Because we work right, we do not discuss the following with competitors:

- prices, costs, customers, bids, margins, markets or any other non-public competitively sensitive information
- agreements to fix prices or limit production, or divide up our customers, suppliers or territories

All of our activities have a valid business justification or benefit customers. We must not use our industry position to diminish competition by:

- monopolization
- tying (selling one product on the condition that the customer buys a second product)
- price discrimination between similarly situated customers
- predatory pricing (pricing below cost)

**BRUNA SAKAMOTO,
SUZANO**



- We compete fairly. We naturally differentiate ourselves from our competitors by creating products that benefit the world and generate value for our customers and shareholders.

- Someday you might be asked why you had a particular meeting or conversation with a competitor. To help document the legitimate business purpose, you should:

- where practical, have an agenda pre-approved by the Law Department
- otherwise, after the meeting fill out a Competitor Meeting Form to document the conversation
- for the form or further information, please go to our Competition Law portal

WHAT SHOULD I DO?

Q: “At a trade show, I ran into a friend who works for a competitor. She wanted to compare notes on how our companies were performing, specifically whether prices would be going up. Is this a problem?”

A: Yes. You should let her know you cannot discuss the information. You cannot exchange competitively sensitive information such as pricing and strategic plans. It does not matter where you were approached; there are no unofficial conversations. Exchanges of sensitive information or oral agreements can violate competition laws. If she persists, excuse yourself and call a Celanese lawyer.

We gather industry information only through legitimate sources and do not obtain competitively sensitive non-public information (e.g., pricing, capacity, output, request for purchase/bids, profit margins, customer lists, sales, marketing and promotional plans and strategies) from our competitors or other improper channels.

- We make only true and legal statements about our competitors and their products.
- We hold confidential non-public pricing or other information of our suppliers.
- We respect our previous employer’s confidential information and do not use it for the benefit of Celanese.

WHAT SHOULD I DO?

Q: “We have to quickly process purchase/sales orders for customers and suppliers and do not have time to manually screen every supplier or customer against U.S. or other government lists. Can I skip this process?”

A: Prior to processing an order, each Celanese customer and supplier is systematically checked against U.S. and other government lists of entities prohibited from engaging in business. You may not manually process orders without conducting the proper screening. Contact Global Trade Compliance if you have any questions or concerns.



CELANESE AT WORK

Several Celanese products can be found in various carpet applications. Celanese Emulsion polymers produce waterborne polymers used in carpet backing for maximized adhesion and improved durability.

Trade compliance

In order to service customers around the world, it is important that we are recognized as a company that takes international trade laws seriously. As a U.S. based company, it is our strategy to apply U.S. trade laws and regulations to our Company and its subsidiaries, regardless of where they are located. We will also comply with local trade laws and regulations as long as they are not contradictory to U.S. laws and regulations.

The nature of our products often means we must determine if a customer order or internal or external transfer of technology is subject to trade controls. Exchanges of information and technology across national boundaries (including training, e-mail and web access) may require special approvals, licenses or permits. Whether a particular transaction requires prior approval will depend on the product's specifications, country of origin and destination, intended end use, identity of the consignee(s) and the identity of the ultimate end user.

IS IT
OKAY?

Q: "I know one of our customers is re-selling Celanese products to North Korea. Is this a problem?"

A: Yes. United States law prohibits U.S. companies and their subsidiaries from exporting to certain listed countries. North Korea is currently on this list. Any proposed dealing (including indirect dealing through a third party) with a country or entity subject to a U.S. sanction or embargo is prohibited without prior review by the Law Department to determine whether the proposed conduct is allowable under U.S. law.



STEPHANIE DAIGLE,
LAS COLINAS

EMPOWERING YOU



Restrictions on international commercial and financial transactions include:

- transactions with designated individuals, companies and organizations
 - These trade restrictions prohibit or limit dealings with listed countries, individuals and organizations. Individuals, companies and organizations designated under these restrictions may be located in any country and may include well-known financial institutions.
- restriction on chemicals transfers and other export controls
 - The manufacture, use and sale of chemicals and chemical-related technical data that might have chemical weapons applications, or are used in the manufacture of illegal drugs, are regulated by various international agreements.

Resources

- Anti-Corruption program at <http://oneportal.celanese.com/sites/AntiCorruption>
- Competition Law program at <http://oneportal.celanese.com/sites/CompetitionLaw>
- Guidelines for Meeting with Competitors
- Global Contracts Review Policy
- Global Procurement Policy

- Anything that crosses a country's border is subject to numerous import and export regulations and laws. Examples of other regulations include embargoes, product and technical data controls, boycotts and tariff classifications.
- Cooperation and participation in an unsanctioned foreign boycott is against U.S. law and our policy. Please notify the Law Department of any suspected boycott request, as U.S. law requires that these be reported to the government.

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 RETALIATION IS PROHIBITED.

WHAT SHOULD I DO?

Q: “I noticed that a co-worker is not using the proper tool for a task – what should I do?”

A: Our safety program, KeepSAFE, reminds us of our obligation for the safety of ourselves and our co-workers. You should mention your concern to the co-worker and ask if they need your help to ensure the task is performed safely.

Sustainability

Celanese is proud to operate responsibly to make a positive impact on our communities, the lives of those with whom we work and the world.

Environmental, health, occupational safety and process safety

Keeping ourselves and others injury free is the most important thing we do at Celanese. We are a Responsible Care® company committed to protecting the environment, preserving the health and safety of our employees and communities, assuring the safe operations of our processes and complying with all applicable laws and regulations. We strive to be an industry leader in environmental stewardship through world-class efficiencies in energy, waste management, air emissions and water use by:

- designing and operating our facilities to provide our employees with a safe workplace and to minimize the potential for adverse impacts on health and the environment
- producing and selling products that can be manufactured, distributed, used and disposed of safely
- doing business with contractors who comply with applicable laws and regulations and share our EHS standards
- using key metrics to drive continuous improvement of our EHS performance
- using good science to design and manage significant risks arising from our activities and our products
- reporting spills or releases from Celanese operations

WE CAN IMPROVE THE WORLD

Chad LaFreniere of our Nanjing Shared Service Center leads a team of volunteers painting a local school.



Together, we can



Celanese employees participated in the creation of this painting that communicates our vision and values.



Celanese employees around the world are making a difference in their local communities. Our approach to community service is simple: give where we can make the greatest difference with the skills we have.

create the future



Shown here and throughout this booklet are Celanese scientists, engineers and other professionals giving of their time and talents to better their communities...and ultimately helping to improve the world.

EMPOWERING YOU

- Slow down and act purposefully. Many accidents happen when we are rushed. Take a minute to consider the hazards associated with your job.
- Our “Keep Safe” safety initiative reminds us that safety isn’t just a program ... it’s our culture.
- Remember these four basic commitments to workplace safety in your daily activities:
 - recognize, report and work with colleagues to address hazards observed in the workplace
 - ensure proper training, have proper tools and identify potential hazards before performing tasks
 - follow established safety and operating procedures
 - help to ensure that changes to equipment or procedures are reviewed and approved using Management of Change processes

Corporate social responsibility

Celanese’s commitment to responsible corporate citizenship goes beyond regulatory compliance. It is embedded in our Working Right principles and is integral to all aspects of our company. Our responsibility as good corporate citizens is an economic, environmental and social prerequisite for continued commercial success.

Our community service activities and the Celanese Foundation enable us to make a difference in our communities. You are encouraged, but never required, to contribute funds to the Celanese Foundation and other charitable organizations, or to participate in Company-sponsored community service activities.

Political contributions

- We encourage you to make individual political contributions where allowed by local law.
- In many countries, political contributions by employees must not be made, or even appear to be made, with Celanese funds or reimbursed from Celanese’s funds. Because of this, you should not reference “Celanese” in any political contributions you make.
- In some countries, you may also be eligible to participate in a political advocacy organization, such as CelpAC in the U.S., which combines the contributions of many employees and retirees to advocate on behalf of laws that favor Celanese.
- Our Public Affairs group is our advocate for political engagement.

CLECIO PACHECO,
SUZANO





WE CAN IMPROVE THE WORLD

Meng Zhonghui from Nanjing participates in a class kickoff ceremony at a local school.

IS IT OKAY?

Travel safety

Our dedication to working safely extends beyond our facilities' boundaries. Celanese is committed to the safety and security of employees traveling on Company business.

- Make any reservation, including lodging reservations, only through our designated travel agent. This allows the Company to know where you are, alert you as needed and provide assistance.
- Check and follow any region-specific travel restrictions as shown on the Celanese travel page at One.Celanese.

Human rights

We are committed to respecting the Human Rights of others. We prohibit the use of child labor, physical punishment or forced or compulsory labor, as well as any other forms of human abuse. We will not knowingly do business with any individual or company that abuses the rights of others.

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RETALIATION IS PROHIBITED.

Q: "While working in the plant on a task, the job changes, an unforeseen event occurs and as a result there is a desire to push forward to complete the task. What should I do?"

A: It is important that the team pauses when unforeseen changes occur to ensure that hazards are identified and measures are in place that result in a successful and injury free completion of the job.

Resources

- Environmental, Health and Safety Policy
- Travel Policy

EMPOWERING YOU

- Remember that electronic messages (email, instant messages and social media) may seem informal, but they are often lasting and recoverable.
- Communications should be factual, accurate and unambiguous.
- Exaggerations, derogatory language and other expressions can be taken out of context.
- Avoid creating misimpressions regarding otherwise legitimate conduct.
- Distinguish theories from conclusions; do not speculate, editorialize or add personal commentary.
- Think before sending emotional or impulsive statements.
- Remember misimpressions could damage Celanese's reputation.

Collaboration

Being a good steward of our Company's information and assets helps us work collaboratively and effectively.

Communications

Good communication is a competitive advantage, and builds a more efficient, responsive and empowered organization. When we work right we base our communications upon open, honest and factual dialogue within our Company, with business partners and with our communities.

Email and other electronic communications can be easily copied or forwarded without our knowledge or consent. Therefore, compose all communications with the same care we take with more formal communications.

WHAT
SHOULD
I DO



Q: "In my files I have a copy of a presentation that includes some handwritten notes from a meeting. This document is likely subject to a legal hold, but since I am not the document's author, must I retain it?"

A: Yes. Not only the original document, but also all other copies or versions with notations retained by others must be kept if subject to a legal hold.

PETRA CZUGLER,
SULZBACH, AND
JASON ESTES,
LAS COLINAS





WE CAN IMPROVE THE WORLD

Cangrejara,
Mexico
employees
Reyna Martinez
and Karen Ruiz
are making
a difference
in their
community
by planting
trees at a local
primary school.

Information management

Collaboration necessitates that we share information. We manage information responsibly by creating it thoughtfully, sharing it appropriately and retaining it only as long as it has significant business value.

- We only retain information for its significant business value, because it is a record or subject to a legal hold, and we foster collaboration by storing information in a shared location.
- Most emails have only temporary value and should not be retained more than 90 days.
- Periodically we should review electronic and hard-copy documents in our possession and on our collaborative sites, and dispose of expired records and other information with no current significant business value.
- Never alter or dispose of any information during reasonably foreseeable or on-going litigation, investigations or audits.

IS IT OKAY?

Q: “I work in Procurement and need to keep certain vendor emails for future contract renewals. I typically keep these types of emails on my hard drive for convenience. Is that okay?”

A: Working collaboratively and efficiently means storing information in a place where your team can access it. These emails could be valuable to others in your department who may work with this vendor in the future.



**WE CAN
IMPROVE
THE
WORLD**

**Employees
from
Sulzbach
and
Frankfurt
build a
Garden
House
for local
youth.**

**IS IT
OKAY?**

Q: “We are developing a new polymer for a potential customer. Do I need to do anything special before sending them a sample?”

A: Providing samples of a new polymer may reveal recipes or process trade secrets, therefore you must first put in place a contract containing confidentiality or non-disclosure provisions such as a Non-Disclosure Agreement (NDA).

Confidential information

Disclosing confidential information inappropriately could harm the Company or unfairly advantage others, so we must balance the need to collaborate with the need to protect critical Company information. All non-public Company information is confidential, including financial information, employee information, trade secrets, price and customer lists, contracts, business development opportunities and business, sales and marketing plans. Some confidential information such as trade secrets, salaries or strategic information may be sensitive in nature and require careful handling and use.

By working right we:

- treat sensitive information with the highest level of respect and integrity
- discuss sensitive matters in private and secure settings only with those who have a legitimate business purpose
- keep sensitive information, in any format, in a secure area and retain and ultimately dispose of it properly
- lawfully obtain or use the confidential information of others

CELANESE AT WORK

Celanese Engineered materials are produced for demanding automotive exterior applications. These high-performance engineering polymers provide UV stability as well as resistance to chemicals, corrosion and high temperatures.



EMPOWERING YOU

- The Company relies on the new ideas of innovative employees. Inventions conceived during the course of employment are owned by our Company and must be shared with Celanese, enabling us to benefit from your ideas.
- Sharing information is needed for collaboration and innovation. Maintaining appropriate protection of our trade secret information is critical to maintaining our competitive advantage. Be mindful of how you share and store trade secrets.

Intellectual property

Intellectual Property (IP) is an important asset of the Company and helps protect our competitive advantage. IP includes invention disclosures, patents, trademarks, copyrights and trade secrets. Some IP such as trade secrets comprise sensitive information which may require special protection and confidentiality.

Before sharing non-public Company information or trade secrets outside of our Company, we must first ensure that a Non-Disclosure Agreement is in place. Always consider the sensitive nature of the information before sharing it with co-workers or those outside of our Company. Some examples of the types of things that may be trade secrets are manufacturing methods, formulations and product development and research activities.

EMPOWERING YOU

- Be aware of whether the information you are using is employee information.
- Only discuss or view employee information that is necessary to do your job.
- Some examples of employee information are performance history, addresses, telephone numbers, dates of birth, or financial information.

WHAT SHOULD I DO?

Q: “I am a German citizen who is currently working in China. Do the protections given to me under German Data Privacy laws still protect me in China?”

A: Yes, protections afforded employees in their home countries follow them wherever they are employed. It is important for managers to understand the privacy laws of the home countries of their employees.

Data privacy

Protecting the personal information of our colleagues, customers or other individuals is important to Celanese, because we respect the privacy of others. That means responsibly handling personal information as outlined in applicable privacy laws and Company policies.

- We should always be careful of how we disclose, store and use employee information.
- We ensure that we only use employee information for the legitimate purpose for which it was provided.
- While Celanese respects every individual’s privacy, any materials and electronic devices on Celanese property or information on Celanese electronic systems may be subject to inspection, as allowed by local law.



**WE CAN
IMPROVE
THE WORLD**

Carmen Tropsch with two winners of the Celanese Christmas Olympics at a kindergarten in Sulzbach.

CLAIRE YANKES AND
PATRICK DAILEY,
LAS COLINAS

IS IT OKAY?

Q: "Sometime I like to stream music from the Internet while I'm at my workstation. Is that okay?"

A: Using the Internet at any time may slow down our network. As a global Company, we have many applications running around the clock. Unnecessary usage for extended periods may hinder business processes.

Computer systems and Internet usage

When we work right, we use Company tools or systems such as computers or other electronic devices in a safe and responsible manner to ensure the integrity of our electronic information and the long-term success of Celanese. We should always take care to prevent loss or damage to our Celanese equipment and to ensure we connect devices in ways that do not make our networks vulnerable to viruses.

Knowingly circumventing or disabling company protections puts our electronic systems at risk. Internet content filters, web-browser settings, anti-virus protections, access controls, limits to printing and copying, and mobile device controls provide important protection for our critical electronic information assets. Should any of these controls impede your work, contact Information Technology (IT) for assistance.

Personal usage of the Internet is allowed, but should be limited. All Internet usage – especially accessing videos or music – reduces network capacity available for business use.

Using our electronic equipment in an ethical, legal and responsible manner also means that we never use our electronic devices to access or send sexually explicitly, discriminatory, harassing or other potentially offensive materials.

- Protect all I.D.s, passwords and devices that provide access to Celanese computer systems or networks.

WHAT SHOULD I DO?

Q: "One of my customers wanted a copy of a confidential proposal downloaded onto their memory stick. Since my USB drive is disabled, is it okay to send it to a shared Internet storage site to be retrieved by our client?"

A: We have security controls in place to protect our confidential information. By circumventing these controls, we put our Company's information at undue risk, even if we are trying to meet our customer's needs. Contact IT if you need help securely transmitting information.

IS IT OKAY?

Q: "Can I bring my own personal software and install it at work?"

A: Installing personal software onto a Celanese device can make our electronic information networks vulnerable to viruses or other loss of information. If you need additional software to perform your job, please contact IT.

- Access granted to employees to systems and / or data for certain job functions, should be reviewed and removed if job responsibilities change.

- Use Company licensed software according to licensing agreements and do not duplicate without authorization.

- Personally owned devices and applications should not be used to access or store Celanese business information unless specifically authorized.

Social media

Social media outlets are an important method of personal and business communications. We work right when we use care and consideration in posting or sharing anything on external social media sites, especially as it relates to Celanese. Remember to:

- obtain the Company's specific authorization before using social media on behalf of Celanese
- protect confidential or proprietary company information, including trade secrets
- make clear when referencing the Company in personal social media communications that we do not speak for the Company
- consider that we lose control of how information may be used when we share it on social media

**JIMMY MANNING,
SHELBY**

IS IT OKAY?

Q: "Can I post on social media during my work day?"

A: Yes, provided that you do not let these activities take away from your job responsibilities.



WHAT SHOULD I DO?

Q: “A new member of our sales team has offered to provide the names of customers he worked with at his prior job. Is it okay to use a third-party’s proprietary information?”

A: Not only do we want to protect our Company’s confidential information, but we also have an obligation to not seek out or use the confidential information of others. A list of customer names is third-party proprietary information; therefore only use information of others that is publicly available or legally obtained.

Protecting the information of others

During the performance of our jobs, we may learn of confidential personal or proprietary business information belonging to customers, suppliers, former employees, contractors, joint venture partners, job applicants or other third parties. We have an obligation to keep this information confidential and only use it for its intended purpose. If we learn of or receive such information in error, we have an obligation to return, delete and not use this information. We should also ensure that we follow copyright laws by never duplicating unauthorized copyrighted materials including copyrighted software.

Obligations after employment

Your obligations to Celanese continue after your employment. You should not retain, use, share or disclose any confidential information after you leave the Company, nor should you take files or documents created during your employment with you when you leave.

CLAUDENIR SILVA,
SUZANO



ETHICS HELPLINE

1-866-384-4223

(866-ETHIC CE)

GLOBAL: <https://www.compliance-helpline.com/CelaneseBCP.jsp>

EUROPE: <https://www.compliance-helpline.com/CelaneseEU.jsp>

RETALIATION IS PROHIBITED.

Resources

- Employee Data Protection Policy
- Safe Harbor Privacy Policy
- Social Media Policy
- Electronic Communications Policy
- Global Communications Policy
- Records Retention and Information Management Policy

IS IT OKAY?

Q: “I am involved with a procurement request for which my brother’s company may bid. Celanese could save time vetting vendors by hiring his company, because I know he can be trusted to provide us with the best service at a good price. Is there a potential conflict of interest?”

A: Yes. Hiring your brother’s company simply because you trust him creates a conflict of interest. You should disclose this relationship to your supervisor. His company might be able to participate in the bidding process without your involvement.

WHAT SHOULD I DO?

Shareholder value

We have a responsibility to our shareholders to protect and grow their investment in our Company and to uphold the trust they have placed in us.

Conflicts of interest

The Company trusts you to make decisions and take actions on its behalf in order to grow shareholder value. Loyalty to our Company means ensuring that personal interests do not interfere with that trust. A conflict of interest may arise when our business actions appear to be influenced by personal benefit or relationships. Therefore, we should avoid conflicts of interest and, if they do arise, we should disclose them to our supervisor.

Talk with your supervisor about:

- situations that might interfere with your ability to make independent judgments or decisions on behalf of Celanese
- circumstances that may put your interests or those of a family member in potential conflict with Celanese
- non-Celanese officer or director positions before accepting them (and seek approvals as required by the Policy on Officer and Directorships Outside Celanese)

Q: “My supervisor and I work well together, and I think we have the potential for a romantic relationship. Is it appropriate for me to ask my supervisor out on a date?”

A: We should avoid dating a supervisor because it will always present a conflict of interest with the supervisor’s performance management responsibilities and may present the appearance of a conflict to co-workers. Please avoid this situation unless protected by local law.



WE CAN IMPROVE THE WORLD

Walk for Wishes participants enjoy the Mustangs of Las Colinas sculpture near our corporate headquarters.

Personal gain and business opportunities

We all have a responsibility to advance and protect our Company's interests. Pursuing a personal gain or business opportunity may be a conflict of interest if we:

- use Company property, information or our position with the Company, or
- compete with the Company.

If you discover, or are presented with, a business opportunity as a result of your job at Celanese, you should disclose the terms and conditions to your supervisor for approval before pursuing the opportunity.

EMPOWERING YOU

● Many conflicts of interest may be avoided or resolved by disclosing and discussing them with your supervisor so that the matter can be addressed appropriately.

● Excessive gifts and entertainment could be perceived as a bribe.

● Asking for gifts or entertainment may give the appearance that your future decisions may be influenced by the response, and should be avoided.

WHAT SHOULD I DO?

Q: “I’ve been planning to sell Celanese stock in anticipation of my daughter’s entrance into college, but I just learned of some material information that is not available to others outside of our Company. Can I still make the trade?”

A: Regardless of your prior plans, you shouldn’t buy or sell Company stock while aware of material, non-public information, because you will be considered to have traded on the basis of that information even though it was not a significant factor in your trading decision.

Gifts and entertainment

Gifts and entertainment foster goodwill in business relationships when they are reasonable and appropriate. However, excessive courtesies can raise the appearance of a conflict of interest or a bribe.

While gifts and entertainment may be exchanged, we should not provide or accept gifts, favors or entertainment that may create undue influence. Take special care when considering gifts and entertainment for government officials, which are illegal in many countries and are addressed in the Anti-Corruption section of Working Right.

Giving or receiving gifts and entertainment is appropriate if:

- the value is reasonable and appropriate given
 - the business relationship, and
 - the giver and recipient’s positions
- could not be considered a bribe – an intent to gain an improper advantage
- offered infrequently or reciprocally
- not consisting of cash or cash equivalents
- consistent with our ethical standards
- transparent and recorded accurately in our books and records
- consistent with the recipient’s policies, to your knowledge

If Company policy prohibits a payment, you may not use your own funds for the expense.

As a guideline, receipt of gifts valued over \$100 should be discussed with your supervisor, but does not require central reporting.

WE CAN IMPROVE THE WORLD

Janet Zhu works with a high school student in Shanghai.





STEVE WINE, NARROWS

Insider trading

We cannot ask the public to invest in the Company without assuring them that all potential investors have the same access to material information. However, at times you may become aware of information about our Company or other companies that is not yet available to the general public.

You may not trade in the securities of Celanese or the other company when you have material, non-public information – that is, information that a reasonable investor would likely consider important in deciding whether to buy, sell or hold securities. Such trading is illegal and strictly prohibited.

- Information is considered public beginning on the third business day after it has been released to the public, typically through a press release or SEC filing.
- As a precaution, certain officers and other employees are restricted from trading in Company securities during certain periods of the year. Employees should refer to the Company's Insider Trading Policy for more information and additional restrictions.
- Whether or not you personally profit, you must never give someone trading recommendations based on inside information. This prohibition includes information transmitted orally, electronically or by any other means.

EMPOWERING YOU

- A continuation of previously-established instructions for investing in Celanese securities, such as through the Company's retirement plans, is not considered "trading." However, any change in your investment instructions during certain periods could be restricted by our Insider Trading Policy.
- The control activities that you perform are important to our Company. Our Chief Executive Officer and Chief Financial Officer sign public certifications that our financial information is accurate and that our internal controls are effective. In making these representations, they rely on you to perform internal controls, maintain accurate records and prepare honest and accurate control assessments.



NOCKY GARZA, BISHOP

IS IT OKAY?

Q: “My supervisor asked me to record a transaction without any supporting documentation. Is it okay since I would be following my supervisor’s direction?”

A: Employees are personally responsible for ensuring that transactions are accurately documented and properly supported. You should never follow anyone’s direction to violate laws or Company policies. Remember, we work for Celanese and its shareholders, not any one supervisor, and Working Right prohibits retaliation should you report this.

- Exercising stock options is considered a “trade.”
- Never purchase Celanese securities on margin, or take actions that hedge investments in our securities. Comply fully with Celanese’s Insider Trading Policy.

Financial integrity

Our shareholders rely on us to fairly present the financial position of the Company. Celanese is committed to maintaining proper accounting records and providing full, fair, accurate, timely and understandable disclosure of both financial and non-financial information. The purpose of our internal controls is to meet these commitments.

We work right when we:

- ensure transactions are recorded accurately, completely, in reasonable detail and in a timely manner on the Company’s books and records to facilitate preparation of financial statements
- follow our Company’s internal control policies and procedures to ensure the accuracy and reliability of accounting records

HANNAH POWER,
BAY CITY



- base accounting decisions on applicable accounting standards and Celanese policies and procedures, and not on business concerns
- make true and supported statements or entries in the books and records of our Company or in any public disclosure, and in internal or external correspondence
- properly protect Company assets, compare asset records with actual assets regularly and take proper action to reconcile any variances
- seek reimbursement for and only approve valid and documented business expenses



PHOEBE LI,
SHANGHAI

Fraud

We act with honesty and integrity when working with our Company's materials, funds and financial reporting systems. All fraudulent activities, including kickbacks, are strictly prohibited. We are all expected to take a proper approach in helping to prevent, detect and report activities that may be or appear to be illegal or fraudulent.

Cooperate with internal and external investigations

Investigations are sometimes necessary to review business practices, commercial and operational issues or potential violations of law or internal policies. We always cooperate fully with investigations and audits.

- Our responses to investigation or audit inquiries will be honest and truthful.
- Never alter or destroy records in response to or in anticipation of an investigation or audit.
- Any time we become aware that an investigation involving Celanese is being conducted by a government official, contact the Law Department immediately.
- If a government official presents a valid order requiring immediate action, cooperate but simultaneously contact the Law Department.
- Work with the Law Department to respond to litigation or requests from government agencies.
- Do not discuss an internal investigation with anyone, unless instructed to do so by the investigators.



CELANESE AT WORK

Our Clarifoil® thermoform film is made primarily from wood pulp, a renewable resource. It differs from other laminates because of its ease of use, exceptional clarity, thermal stability and because it is friendly to our environment.

SAM BRYANT,
BAY CITY



IS IT OKAY?

Q: “My business line would like to use a social media site for marketing purposes. Do we need approval from Corporate Communications?”

A: Yes. Communications is responsible for maintaining the Company's brand and image. Always get approval from the Communications Department before posting on social media sites on behalf of Celanese.

External communications

Information given to the public about our Company can affect our reputation and the price of Celanese securities.

- External communications should be handled only by authorized representatives in accordance with our Global Communications Policy.
- Take care not to share (privately, publicly or through social media) information about the Company with the news media, analysts, industry research firms, expert network firms or politicians.
- Be cautious of expert network firms, including outside analysts or media, that may be seeking inside information.

ETHICS HELPLINE

1-866-384-4223

(866-ETHIC CE)

GLOBAL: <https://www.compliance-helpline.com/CelaneseBCP.jsp>

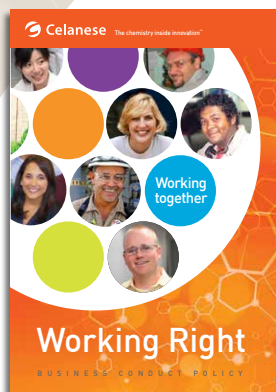
EUROPE: <https://www.compliance-helpline.com/CelaneseEU.jsp>

RETALIATION IS PROHIBITED.

Resources

- Policy on Officer and Directorships Outside Celanese
- Global Approval Matrix Policy
- Financial Code of Ethics
- Insider Trading Policy

Quick reference guide



Working Right

- Available in Chinese, Dutch, English, French, German, Hungarian, Portuguese, Spanish and Swedish to employees worldwide.
- On **One.Celanese** intranet in the Policies and Guidelines/BCP content area.
- At **www.Celanese.com** in the Compliance and Ethics content area.
- Any waiver of Working Right for executive officers or directors may be made only by the Board of Directors or a Board committee.

Compliance program training and certification

- Go to the Preventive Law Tools and Training portal at **<http://one.celanese.com/public/LawDept/PreventiveLaw>** to find in-depth and specialized training on compliance topics.
- Management employees, as well as some agents and contractors performing key internal controls, must certify periodically that they have read, understand and are in compliance with Working Right.



Just call...

The Ethics Helpline is toll free and available 24 hours a day/7 days a week with communications specialists who speak all languages of our work force.



...or click

- **<https://www.compliance-helpline.com/CelaneseBCP.jsp>**
- **<https://www.compliance-helpline.com/CelaneseEU.jsp>**

Additional resources

Company Policies and additional resources are available on our **One.Celanese** intranet site in the Policies and Guidelines content area.



Ethics Helpline

- To protect your confidentiality, the Ethics Helpline is managed by an independent, third-party provider. The communications specialists receiving your call do not have caller ID and are trained to professionally handle your question or concern.
- Employees, contractors or any non-company person can submit a question or ethical concern to the Ethics Helpline by phone or on the web.
- Your identity and personal information is kept strictly confidential and will only be disclosed under certain circumstances as directed by privacy guidelines, laws and regulations.
- You may make an anonymous inquiry or report; however, disclosing your identity is encouraged. This facilitates follow-up questions, and in some circumstances, protects your individual legal rights.
- European law allows anonymous calls from Europe but only for reporting accounting, internal accounting controls, auditing matters, bribery and financial issues.
- Your report will be appropriately investigated by the Compliance Office and reported to the Audit Committee of the Board of Directors.
- The PIN number assigned to you allows you to check the status of your report or to follow-up with additional details.

International Dialing
(toll free)

1. AT&T Direct® for your country
2. Wait for tone
3. Then 866-384-4223

COUNTRY	AT&T DIRECT®
Belgium	0-800-100-10
Brazil	0800 890 0288
China, PRC	108-11
France	0805-701-288
Germany	0-800-2255-288
Hungary	06 800-01111
India	000-117
Italy	800-172-444
Japan	00 539-111
Mexico	01-800-288-2872
Netherlands	0800-022-9111
Russia	363-2400
Singapore	800-0111-111
Spain	900-99-00-11
Sweden	020 799 111
U.K.	0800-89-0011

More AT&T Direct® numbers can be found at www.business.att.com/bt/access.jsp

ETHICS HELPLINE  
1-866-384-4223
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GLOBAL: <https://www.compliance-helpline.com/CelaneseBCP.jsp>
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Know more: www.celanese.com/compliance-and-ethics.aspx