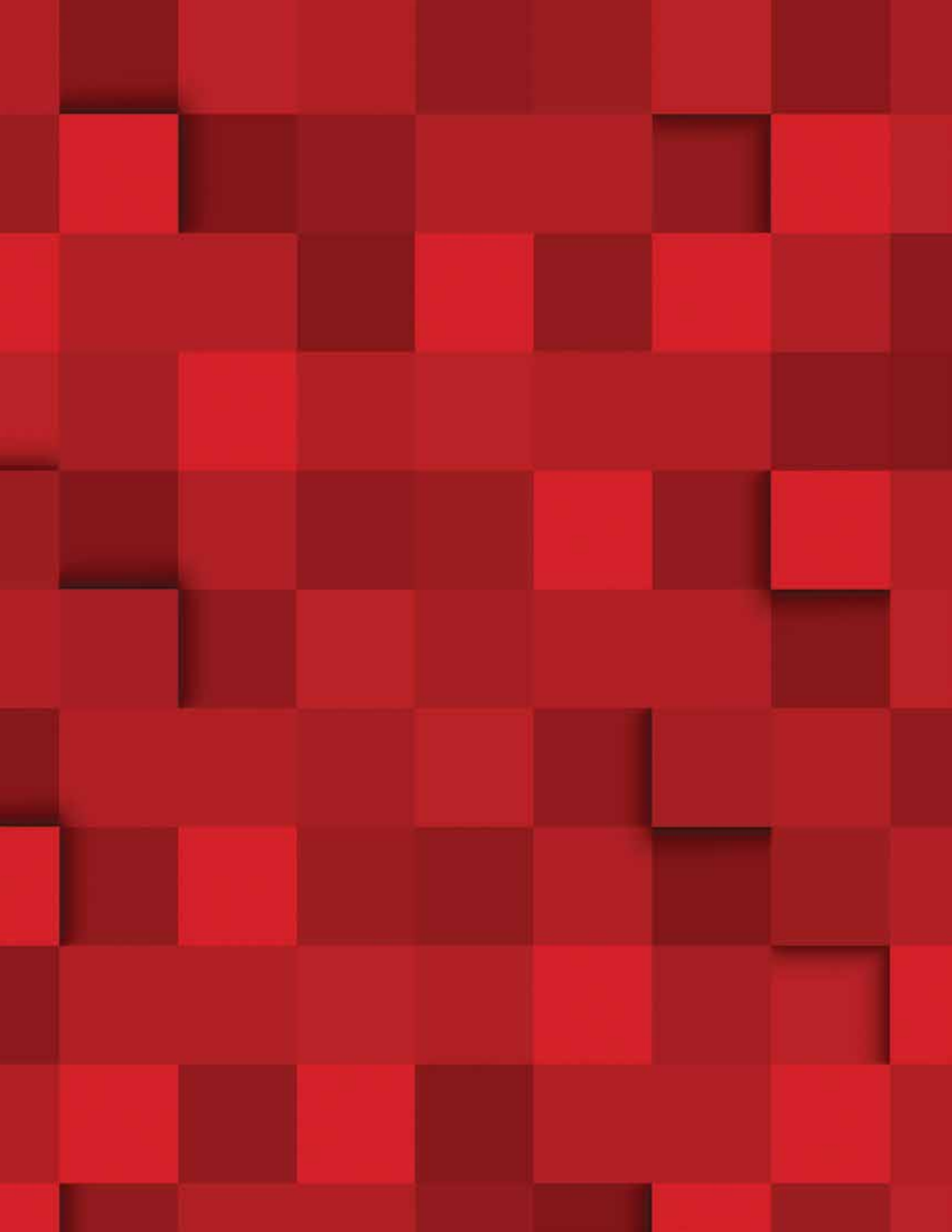




OUR CODE OF CONDUCT



Everything we do reflects on our company and our ability to be an industry leader. We work hard to manufacture and deliver great products and services, but never at the expense of our Core Values.

Olin is committed to our Core Values: Act With Integrity; Drive Innovation and Improvement; and Lift Olin People. This commitment helps us, with each decision we make, to do what's right.



The Olin Code of Conduct is our binding and practical guide to making ethical decisions at every level, regardless of our position or seniority. No matter our responsibilities or location around the world, the Code applies to all of us: Directors, Officers, Managers, and Employees. Everyone should read, understand, and refer to the Code as often as needed.

I encourage you to talk with your manager or any of the other resources listed in the Code whenever you have questions or concerns with decision making. Through engaged dialogue we learn and ensure compliance, but more importantly, we live our Values every day and in every way.

Thank you for your commitment to representing Olin with the highest standards of integrity to enable our company's long-term growth and prosperity.

A handwritten signature in black ink that reads "Scott Sutton".

Scott Sutton
President & CEO
Olin Corporation

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SECTION 1

Our Values and Our Code of Conduct

Our Company Values

Our success as a company is directly linked to our commitment to operate with integrity every day, in every way, and by every employee in our company.

Our Company Values and our Code of Conduct are the basis for how we do business. Our Values establish standards of behavior for every employee at every level of our organization, and our Code of Conduct builds on that foundation.

Olin Values



Act With Integrity

Integrity is doing what's right in every situation – always. It's about complying with the law and Olin's Code of Conduct, policies and procedures, treating others with fairness and respect, meeting our commitments to our customers, maintaining our high-quality standards, and caring for the environment and the communities in which we operate and live.



Drive Innovation and Improvement

Success comes from never being satisfied. We must lead, continually challenge ourselves, be open to new ideas, solve problems, drive value, and look for ways to sustainably reduce cost and eliminate waste.



Lift Olin People

Olin employees define Olin's future. We must value and respect the diversity of our workforce, engage with and learn from one another, and be a role model for others. We must take and accept responsibility, including ensuring that we all are working in a way that protects the health and safety of ourselves and our coworkers.

Every day, the actions we take and the decisions we make help set the tone for our workplace environment and our culture. When these actions comply with our Code of Conduct and Company Values, they drive our success and send a powerful message that integrity really does matter.

Honesty Always

Honesty and openness in all our words and actions are key to everything we do. We must be truthful in our communications, whether verbal or written, and in our actions. We should never lie by making false statements or leaving out the full details. We should not mislead people and we should not steal. Our coworkers, the company as a whole, our communities and shareholders, and the global public rely on us to always tell the truth.

Our Code is Our Commitment

Our Code of Conduct is the foundation of our company's ethics and compliance program. Our Code reflects the standards of behavior expected of everyone at Olin – explaining not just what to do, but how to do it – and helping us every day to put our Company Values into practice.

Each of us must bring the Code of Conduct to life, to make the right decisions in both the regular everyday situations, as well as the difficult ones. While the Code of Conduct cannot cover every company policy or business situation, it is always an appropriate starting point. Please consider all laws, the Code of Conduct, Olin policies and procedures, and our Company Values when faced with questions or decisions at work.

We are all expected to comply with both the letter and the spirit of our Code. Even if we feel pressured to do otherwise, we must understand and adhere to each company policy, procedure, law, and regulation that applies to our jobs. Our Code also requires us to seek guidance if we have any questions or concerns and to cooperate fully in any investigation of suspected violations of the Code, or Olin policies or procedures, that may arise in our work.

Ethical Decision Making and the Ethical Decision Tree

Just as we have safety processes and procedures, we also have models for ethical thinking to guide us through the interactions and decisions that we face when acting on Olin's behalf.

We start with the law. What do the regulations and laws require us to do? Then, if we believe the decision is legal, we start to examine what is the best ethical decision. What do the Code of Conduct and Olin policies and procedures state? If no specific answer is found in the company's Code of Conduct, policies, or procedures, then does our choice follow the meaning and spirit of our Olin Values? And finally, if we believe a decision would be aligned with these other considerations, what would our families, our communities, our customers, and shareholders think about the decision or outcome if we act? Keep all of this in mind as you read through the rest of this Code of Conduct.

We Must All Comply With and Commit to Our Code

We are all obligated to read and follow the Code of Conduct and Company Values. Specifically, every employee of Olin anywhere in the world, whether full-time, part-time, or temporary, must comply with our Code of Conduct. When we refer to Olin in this Code, we are including Olin Winchester and all of Olin's other subsidiaries.

Our Code also applies to members of Olin's Board of Directors concerning all activities they engage in regarding Olin or on behalf of the company or its subsidiaries. Any waivers to Olin's Code involving an executive officer or member of the Board of Directors must be reviewed and approved in advance by the Audit Committee of the Board of Directors and disclosed in accordance with all applicable laws.



Ask Yourself

Unsure of the proper course of action? Ask yourself the following questions. If you can answer **YES** to all of the questions, the decision to move forward is probably okay.

1. Is it legal?

YES NO ?

2. Does it comply with our Code and company policies?

YES NO ?

3. Is it consistent with our Values?

YES NO ?

4. Would I be comfortable explaining my actions to my family?

YES NO ?

5. Would I be comfortable if my actions were made public?

YES NO ?

If you could not answer yes to all of the questions, then STOP and SEEK GUIDANCE before proceeding.

Additionally, our Business Partner Code of Conduct, which aligns with the Code of Conduct, applies to our business partners, including independent agents, distributors, consultants, contractors, and all others operating or acting on our behalf. These business partners can have a direct impact on our reputation through their behavior. For this reason, we expect them to meet the same high standards of integrity when working on behalf of Olin.

Periodically, we may be asked to provide a written certification that we have reviewed and understand our Code, complied with its standards, and are not personally

aware of any violations of the Code. This certification is our pledge to live up to our Code and its expectations and to promptly raise concerns about any situation that we think may violate our Code. Employees who violate our Code put themselves, their fellow employees, and our company at risk and are subject to disciplinary action up to and including termination of employment.

Details about company policies and procedures referenced in this Code are available on Olin's internal website or may be provided by your manager or local Human Resources representatives.



If you have questions or concerns, please reach out to an Ethics Officer, Ethics Advisor, the Ethics & Compliance Office, or any of the other resources listed herein. All concerns and questions are taken seriously and will receive a prompt and professional response.

Seeking Guidance

Our Code, other policies, procedures, and Ethics & Compliance Office communications are designed to provide general guidance. The Code does not provide detailed information about every legal requirement in the countries where we do business, nor can it cover every possible situation, policy, or procedure we must follow. In some cases, the laws, policies, or procedures at a location or business unit may be stricter than those in this Code.

Olin's Ethics & Compliance Office oversees the Code of Conduct and manages ethics initiatives at all Olin locations. In addition, each Olin office or manufacturing facility has one or more designated Ethics Officers or Advisors. Olin's Ethics Officers and Advisors are available to answer questions at any time, no matter the nature of an issue, or

how minor it may seem. Whenever in doubt, reach out to one of the numerous resources available. Generally, your manager is in the best position to help. However, if you prefer to speak to someone else, there are other people and resources within the company that can help:

- Your manager's manager
- The head of your department, location, or business unit
- The Human Resources Department
- Olin's Law Department
- Your local Ethics Advisor or Ethics Officer
- The Ethics & Compliance Office (Ethics@olin.com, or go to MyOlin.com to find contact information)
- The Help-Line, Olin's 24-Hour/7-Days-A-Week confidential resource (www.OlinHelp.com or see the Contacts & Resources section of this Code)

Encouraging Speaking Up and Responsibility To Raise Issues and Concerns

Olin believes that each of us, employees of any level, should feel free to ask questions and raise concerns without fear of retaliation. Employees are encouraged to offer suggestions, discuss issues or problems, and most of all, seek guidance where there is any confusion or miscommunication. It is important for managers (which in this Code includes all supervisors and other Olin people leaders of all levels) to encourage this open communication, and for each of us to ask questions and raise concerns about problems in our workplace. By asking questions or raising concerns early, we help Olin solve problems and ensure a safe and productive work environment.

Guidance for Employees

We should raise issues or concerns with our manager or other resources in an honest and forthright manner. Here are some tips to guide our discussion:

- Schedule a specific time to discuss the issue or concern.
- Discuss the issue clearly, calmly, and professionally.
- Be open to questions and respond with factual information.
- Make concerns about confidentiality clear upfront.

Guidance for Managers

Managers have an important responsibility to lead by example and maintain the highest standards of behavior. This includes ensuring that those they supervise understand our Code and the policies, procedures, laws, and regulations that affect our business and our reputation.

Managers should also work to create an open environment where individuals feel comfortable raising questions, issues, and concerns without fear of retaliation. If an issue is raised, managers are expected to take prompt action to address the concerns and correct any problems that arise, including working with the appropriate resources within Olin. Most importantly, managers must ensure that everyone they supervise understands that ethical business conduct is just as important as our business performance since both are critical to Olin's long-term success.

Those who serve in a management role have an important responsibility to encourage others to report issues and concerns and, when they do, to make sure their concerns are addressed promptly, respectfully, and professionally. Here are some tips for handling concerns properly:

- **Be respectful.** Treat concerns – and the people who raise them – with care.
- **Put away distractions and allow enough time for discussion,** preferably in a private place.
- **Remain objective.** Ask questions in an open-ended manner.

- **Listen calmly and professionally.** Be patient and do not interrupt.
- **Think before providing an answer.** If additional information is needed, obtain it before giving a response.
- **Thank the individual** for bringing the issue forward.
- **Provide updates,** as appropriate, and remember to follow up when the issue is resolved.
- **Protect confidentiality.** Discuss with others only on a strict “need to know” basis.
- **Be alert for any behavior that could be considered retaliatory.** If you see it or hear about it, report it immediately.

Reporting in Good Faith

Olin expects that people will raise concerns in good faith. Good faith means coming forward truthfully with all the information we have about a situation that we believe violates our Code, an Olin policy, or the law. Even if we only suspect that misconduct has occurred or is occurring, we should speak up. That gives Olin a chance to prevent a small problem from becoming a much bigger one. It's okay if it turns out that we were mistaken as long as the report was made honestly. Anyone who makes a report that is not in good faith may be subject to disciplinary action.

Confidentiality of Reports

Concerns that are reported to Olin's Help-Line are kept confidential to the fullest extent possible. To protect confidentiality and ensure anonymity when it is requested and allowed by law, the Help-Line never uses caller ID, recording devices, web-tracking, or any other method to identify any person making a report. When an individual chooses to remain anonymous, the Help-Line service provides a report number, a password, and a follow-up date. The follow-up date is important as it allows the individual to check the status of the report, review any follow-up questions, or submit more information that may be necessary to address the issue or complete an investigation of the concern.

Keep in mind that it can be difficult to investigate certain matters that are reported anonymously if the individual making the report does not provide enough details or follow up as requested.

To Learn More: For additional information about Olin's Help-Line, or to raise a concern, go to OlinHelp.com.



NOT GOOD FAITH

Anne tells her manager about a Code violation but makes untrue statements to get back at a co-worker she does not like. When the full story eventually comes to light, Anne is told that she may face discipline for making false allegations.



GOOD FAITH

Jason realizes after the fact that something he did was against company policy. He lets his manager know right away so that appropriate measures can be taken to fix his mistake.

How Our Company Investigates Concerns

Issues and concerns referred or reported directly to Olin's Ethics & Compliance Office or through Olin's Help-Line service are reviewed by the company's Ethics & Compliance Office. Each report is taken seriously and investigated fully using internal resources within the Ethics & Compliance Office, along with such other resources as may be appropriate, including Olin's Internal Audit Department, Law Department, or Human Resources Department. Individuals assigned by the Ethics & Compliance Office to investigate an issue or concern are chosen based on their relevant knowledge and objectivity.

We are all expected to cooperate fully with any investigation if we are asked to do so. In these cases, we must always provide truthful and complete information. Depending on the nature and seriousness of the issue under investigation, Olin may also

use outside resources and involve senior management up to and including the Audit Committee of Olin's Board of Directors.

Protection From Retaliation

Those who ask questions, seek advice, or raise a concern about a potential violation of our Code, policies, or procedures are protected by Olin's No Retaliation Policy, which is part of Olin's Policy Prohibiting Harassment, Discrimination, Bullying, and Retaliation. This means we can raise an issue in good faith directly to a manager, the Human Resources Department, an Ethics Officer or Ethics Advisor, EHS&S/ORC staff, the Ethics & Compliance Office, the Help-Line, or Law Department without fear of retaliation related to that raised concern or advice. Additionally, employees will be protected when they participate in an investigation. Co-workers and managers may not harass, discriminate against, terminate, suspend, threaten, demote, or deny benefits for anyone who raises a question or concern, or cooperates in any resulting investigation.

Retaliation can involve:

- Threatening, harassing, or discriminating against someone.
- Terminating or demoting someone when it is not warranted.
- Unreasonably increasing an employee's workload.
- Assigning an employee to the dirtiest or most unwelcome tasks or shifts because it is believed they complained.
- Denying someone, or a group of individuals, benefits or training opportunities for which they would otherwise qualify.
- Ostracizing or excluding someone from meetings, events, or discussions.
- Setting unrealistic deadlines to cause an employee or group of employees to fail.
- Breaching the confidentiality of a report or trying to discover who raised a concern.
- Purposefully shunning, ignoring, or disrespecting a person because they raised a question or concern, or participated in an investigation.

Any form of retaliation by a co-worker or a manager is a violation of our Code and will not be tolerated. If you experience retaliation or suspect that it may have occurred, you should immediately contact Olin's Ethics & Compliance Office or Olin's Help-Line. Those who violate our No Retaliation Policy are subject to discipline up to and including termination of employment.

SECTION 2

Supporting One Another



Promoting Opportunity, Diversity, and Inclusion

We believe that diversity is one of our greatest strengths. For this reason, we base our hiring and promotion decisions on the qualifications and skills of an individual without regard to race (color) or ethnicity (national origin and ancestry), gender (including gender identity and expression), religion or creed, disability (mental and physical), age, sexual orientation, marital/domestic partner status, medical condition, genetic information, military and veteran status, or other characteristic or activity that is protected by applicable local, state, and/or federal anti-discrimination law. We also affirmatively recruit, employ, and advance qualified individuals from underrepresented groups.

While diversity represents who we are, inclusion defines how Olin people work together on a daily basis. Inclusion means that we have a work environment that does not exclude or diminish any individual. Olin's leaders have an obligation to ensure that all Olin voices are given equal opportunity to be heard, and to engage in the activities and discussions necessary to run Olin's businesses effectively. Inclusion means that all employees are welcome and encouraged to be a part of helping Olin succeed.

The diversity of our employees is key to our success.



Treating Each Other With Respect and Prohibiting Bullying

At Olin, we are committed to fostering a workplace where every person is treated with dignity, fairness, and respect. This means that every employee, at every level of the company, has the right to work in an atmosphere that is free from discriminatory practices, harassment, or bullying. We all need to treat each other with respect and act appropriately in our work environments. We should not insult or disrespect one another, and there is no room at Olin for behavior that is threatening in word or action. We may not always agree with each other, but respect should be shown to everyone.

Prohibiting Bullying

Extreme forms of disrespect may rise to the level of bullying, and Olin does not tolerate bullying behavior in our workplace. Olin defines bullying as persistent, malicious, unwelcome, severe, and pervasive mistreatment that harms, intimidates, offends, degrades, or humiliates employees or anyone engaged in business with Olin, whether verbal, physical or otherwise, at the place of work or in the course of employment. Such behavior violates Olin's Values and Code of Conduct, which clearly state that all employees will be treated with dignity and respect.

Examples of bullying may include:

- **Verbal bullying:** Slandering, ridiculing, or maligning a person or a person's family member(s); persistent name-calling that is hurtful, insulting, or humiliating; using a person as a focus of jokes; and making abusive and offensive remarks.
- **Physical bullying:** Pushing, shoving, kicking, poking, tripping, assaulting, or threatening to physically assault, and damaging a person's work area or property.

Prohibiting Harassment and Discrimination

While the meaning of harassment can vary by country, Olin has created and prominently posts its policies addressing all forms of harassment and discrimination. We define harassment as any verbal, visual, or physical conduct that denigrates or shows hostility toward an individual because of the individual's lawfully protected characteristics and that has the purpose or effect of violating the dignity of the person concerned, unreasonably interfering with an individual's work performance, or creating an intimidating, hostile, degrading, humiliating, or offensive work environment.

Harassment or discrimination of any individual by any employee or anyone engaged in business with Olin or other third parties over whom the company has control (e.g., non-employees such as contractors, consultants, and vendors) based on a protected characteristic is strictly prohibited. Protected characteristics include an individual's race (color) or ethnicity (national origin and ancestry), gender (gender identity and expression), religion or creed, disability (mental and physical), age, sexual orientation, marital/domestic partner status, medical condition, genetic information, military and veteran status, or other characteristic or activity protected by applicable local, state, and/or federal anti-discrimination laws. The company takes allegations of harassment and discrimination seriously. Olin will take all steps reasonably required to prevent, investigate, and promptly correct any such harassment, discrimination, or other similar conduct in the workplace or in settings in which employees and other service providers to Olin may find themselves in connection with their employment. No matter where it occurs or whom it involves, harassment, discrimination, and bullying are strictly prohibited, and violations will result in disciplinary action up to and including termination of employment.



Questions & Answers

Q Maria works in an open office area with lots of desks close together. She comes to work one day and opens her desk drawer, only to see a typed note that says, "You are ugly, nobody likes you. You should quit." Maria is upset and throws the note away but does not tell anybody about the note. Every few days, Maria finds more insulting notes in her desk and believes she has heard people talking about her in the break room. Is this bullying?

A Yes, the notes are a form of bullying, and Maria or anybody who learns about the notes should notify a manager, the Human Resources Department, an Ethics Advisor or Ethics Officer, or the Ethics & Compliance Office. The Olin Help-Line is also available. Others talking in the break room may be bullying depending on the nature of the discussions, but there would need to be further investigation. At Olin, we treat each other with respect and caring. We are a team, and all of us need to act like respectful adults, even if we do not like each other personally. If a manager or supervisor learns of this type of behavior, they need to notify the Human Resources Department or the Ethics & Compliance Office immediately.

Prohibiting Sexual Harassment

Sexual harassment is defined in Olin's policies as unwanted sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; submission or rejection of such conduct is used as a basis for making employment decisions affecting the individual; or such conduct has the purpose or effect of violating the dignity of the person concerned or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Examples of sexual harassment may include, but are not limited to:

- Unwanted sexual advances or propositions – whether they do or do not involve physical touching.
- Unwanted comments, including comments about a person's body, sexual activities, experiences, perceived shortcomings, preferences, or gender.
- Sexually oriented, suggestive, obscene, or insulting comments, language, or jokes.
- Displaying or possessing in the workplace sexually suggestive, revealing, or pornographic objects, pictures, graffiti, cartoons, or any other materials with sexual content.
- Threats, or promises of preferential treatment, designed to induce submission to or tolerance of any of the above conduct.

Sexual harassment can happen regardless of the individual's gender, gender identity, or gender expression. It can, for example, occur between same-sex individuals as well as between opposite-sex individuals, and does not require that the harassing conduct be motivated by sexual desire. Employees should also be mindful of their behavior in informal business situations, including company-related functions and business trips. Further information about Olin's rules regarding bullying, harassment, or discrimination can be found in Olin's Policy Prohibiting Harassment, Discrimination, Bullying, and Retaliation.

Questions & Answers

Q Amanda's manager has made suggestive comments to her several times. She thinks the behavior constitutes sexual harassment, but she is not sure. What should she do?

A Any time an employee experiences or suspects harassing behavior, they should report it. If Amanda is comfortable, she may want to tell her manager to stop the unwanted behavior. Sometimes this resolves the problem. However, Olin recognizes that she may prefer to have the company address the situation. In this case, Amanda should contact a higher-level member of management or the Human Resources Department for help. She may also report harassing behavior to Olin's Help-Line service.



Preventing Violence in Our Workplace

Threatening behavior or violence in our workplace will not be tolerated. “Violence” includes threats or acts of violence as well as intimidating behavior. In addition, employees may not possess firearms, other weapons, explosive devices, or dangerous materials inside our workplace without prior authorization.

We should immediately report unsafe conditions, a malfunction of monitoring and control equipment, or threatening situations to our manager or another appropriate contact at our location, such as a safety officer, the Environmental, Health, Safety & Security Department, Olin Responsible Care employees, or site security. If a situation presents immediate danger, we should contact security or local authorities without delay.

Questions & Answers

Q Elaine suspects that a co-worker is abusing prescription drugs. Since this is not an illegal substance, should she tell someone?

A Yes. Abuse of legally prescribed drugs can be as dangerous as the abuse of illegal substances. Elaine should share her concerns with her manager, Human Resources, or Olin’s Help-Line service.

Ensuring Our Workplace Is Alcohol- and Drug-Free

We know that alcohol and drug abuse can endanger the health, safety, and security of our fellow employees and our customers. These same substances can also decrease our ability to think, communicate, or respond appropriately in the work environment. Alcohol and drug abuse may also impact the quality and effectiveness of our company operations, the communities where we live, and our company reputation. For this reason, our employees and others working on our premises and worksites, or moving product on our behalf, must not report to work or perform any job duties while under the influence or impaired by alcohol or drugs.

Olin recognizes that some state, local, and international governments have decriminalized the recreational use of marijuana and/or have authorized the use of medical marijuana. Generally, these laws do not modify Olin’s position and policy on the use of marijuana. In the United States, marijuana remains illegal under the federal Controlled Substances Act, and Olin follows federal law and Drug-Free Workplace Act recommendations. Thus, marijuana remains prohibited under Olin’s Substance Abuse Policy; this standard will apply internationally to the extent allowed by employment contracts and national laws of the locations where Olin does business.

The company is committed to providing employees a safe, efficient, and productive work environment. The use, possession, distribution, transfer, or sale of alcohol or unlawful substances remains strictly prohibited while on duty or while on the company’s premises. Additionally, any positive test obtained during a company-performed drug test will, no matter the circumstance, constitute a violation of Olin’s Substance Abuse Policy. This includes a positive test resulting from marijuana use off-premises and/or off-duty.

While on the premises of Olin, performing company business, or operating a vehicle or other potentially dangerous equipment owned or leased by the company, no employee or contractor may be under the influence of unlawful drugs, impairing controlled substances or alcohol, or be impaired by any other drug or substance, or otherwise violate Olin’s Substance Abuse Policy, including a positive drug test.

Olin encourages employees who may have an alcohol or drug problem to seek assistance through a local Employee Assistance Program (EAP). These programs are available globally wherever Olin has operations and offer prepaid, confidential counseling services to any employee or family member of an employee who needs help with personal problems, including drug and alcohol problems. Employees who seek help from the EAP voluntarily are not required to notify their manager or the company.

To Learn More: Contact a Human Resources manager or local Olin Medical Department for the phone number of a local EAP that offers counseling or referral support.

Special Responsibilities for Managers Regarding Harassment, Discrimination, Bullying, Violence in the Workplace, or Substance Abuse

All Olin managers have a specific responsibility to report potential cases of harassment, discrimination, bullying, violence in the workplace, or substance abuse immediately to the appropriate location's Human Resources Department.

Managers must report these situations even if the circumstances of the complaint or situation are unclear and cannot be immediately substantiated. Prompt reporting and investigation by an impartial third party are critical to stopping harassment, discrimination, or bullying before it becomes severe or pervasive.



Corporate Social Responsibility and Protecting Human Rights

We strive to be known as a trusted neighbor in the communities where we live and operate. We know that maintaining an open, ethical stance while also respecting diversity, local and native cultures, and regional or multicultural customs can make a positive difference.

As part of our commitment to good business practices worldwide, we uphold individual human rights, native rights, and the respect of human dignity as important foundations in all of our operations and activities. This means, in part, that we provide reasonable working hours and fair wages for those who work on our behalf. We also have zero-tolerance for the use of child or forced labor or human trafficking practices. We train our drivers and key employees to watch and report any warning signs of human trafficking. We comply with all laws and regulations regarding the protection of at-risk classes and monitor for and avoid the use of materials associated with identified conflicts. We expect our suppliers, consultants, contractors, subcontractors, and other business partners to uphold the same standards.

SECTION 3

Protecting Our Data and Assets





Protecting Our Privacy, Personal Data, and the Privacy of Customer Information

Protecting Our Employees' Privacy

Olin respects all employees' privacy and will handle personal data responsibly and in accordance with our Data Privacy and Breach Notification Policy and all applicable data privacy laws and regulations. Access to personal data is restricted, and our company will protect it from loss, misuse, unauthorized access or disclosure, alteration, or destruction.

While Olin respects employees' privacy, our company reserves the right to inspect our facilities and property, such as computers, telephone records, lockers, emails, files, business documents, equipment, and workplaces, unless prohibited by local law or regulations.

Privacy of Customer and Consumer Information

We have a responsibility to protect customer and consumer information that is provided to us. Olin has assigned a Data Protection Officer and site representatives to help monitor data privacy issues; however, we each also have obligations under data privacy laws to protect customer and consumer information, and we take these laws very seriously. We only access this information when we have a business reason to do so or to comply with laws and regulations. We also take steps to protect the information against loss, misuse, unauthorized access or disclosure, alteration, or destruction. Suppliers and other outside parties who have authorized access to this information are also responsible for protecting this information, and we are committed to monitoring them for compliance. More information regarding Olin's protection of data privacy can be found in the Olin Corporate Data Privacy Policy and related procedures, as well as Olin's Corporate Information Technology policies and procedures.

Questions & Answers

- Q** Tonya works with confidential personnel information as part of her job. Because she travels frequently, she keeps this information in a folder on her laptop and on a USB drive that she can easily access. Is Tonya using proper procedures to safeguard this information?
- A** No. Sensitive information, including personal employee data, should not be stored locally on a laptop computer or external storage device unless absolutely necessary. In that case, the sensitive information must be encrypted using Olin approved file encryption or encrypted devices, and the sensitive information should be deleted when no longer necessary. Contact our IT Support Department if you have questions.

Safeguarding Olin's Assets

Use of Company Resources

Each of us is responsible for protecting and preserving Olin's resources. We must make sure that we use company resources only for business purposes – never for personal financial gain. We know that any form of theft, fraud, or embezzlement is clearly wrong and against both our Olin Values, as well as the Code of Conduct. We must also be sure that we have our manager's approval for any personal, community, or charitable use of these resources. If personal use is allowed, we must take care to avoid any use that is excessive or violates other company policies.

Here are some guidelines for the use of our company resources:

- Limit personal use of company telephones, company email accounts, fax machines, and photocopiers.
- Limit personal use of electronic networks, including the Internet, and use only as authorized by company policy.
- Do not copy computer software programs unless authorized by licensing agreements.
- Do not take office supplies home unless for approved work use.
- Make sure to have authorization to use company vehicles, tools, equipment, or other company property.

Company Resources Include

- ✓ Company time
- ✓ Materials
- ✓ Supplies
- ✓ Equipment
- ✓ Information
- ✓ Email
- ✓ Telephones
- ✓ Computer systems



INCORRECT

Hu wants to borrow a hammer and drill from his site to use on a project at home over the weekend. He also needs several screws and bolts and knows that the inventory area at the plant has extras of the tools, screws, and bolts. Without asking permission, Hu takes home the tools and materials for use on the home project but returns the tools the next week.

EXPLANATION

Most sites have a process for allowing permission to borrow some tools or items with a pass and proof of return, but taking tools offsite without permission may be considered criminal theft – even if the employee plans to return them. Similarly, taking materials purchased for use by the company and then using them on personal projects would be theft.



CORRECT

Ana wants to borrow a drill, safety glasses, ear protection, and some gloves from work for a home project. She speaks with the site leader about borrowing the tool and the personal protective equipment and is given written permission. She returns the drill the next week, as promised, but the personal protective gear is soiled so not returned.

EXPLANATION

Getting written permission is the best way to respect company tools and equipment. Certain tools can never be borrowed by employees if they represent a safety risk or are possibly contaminated. At some sites, safety equipment such as glasses, goggles, earplugs, and gloves can be borrowed by employees even if they cannot be reused on site. Again, permission must be received before removing the items from the site.

Safe and Appropriate Use of Our Networks

Whether we are in our office or traveling outside our workplace, we each have the responsibility to protect our company's networks and information. This means we must learn and follow the data protection and information security rules that apply to our jobs.

To avoid security breaches, we must follow all cybersecurity and data privacy control procedures for network systems, company computers, and other electronic devices. All devices that are connected to our company's network – whether personally owned or issued by Olin – must have appropriate access protection and be equipped with approved virus-scanning software with a current virus definition file.

We must also be sure that our portable devices, such as laptop computers, smartphones, and storage devices, are always secured and that any confidential information stored on these devices is password protected. In addition, we must never share passwords or leave password information in a place where it can be seen by others – even while working in our various premises. If we suspect that any of our data has been tampered with or is missing, we have an obligation to report what we know to our manager and the IT Department immediately.

Email and the Internet

Our use of company networks for email and Internet access is both a necessity and a privilege, and we must use the highest standards of conduct in all of our usage and communications. This is true whether we are accessing Olin's network from an Olin-owned computer in our workplace or remotely from our home, a hotel, or other non-Olin location.

We must also remember that our networks and information systems are for company-related business purposes. While limited personal use may be acceptable if it is authorized by our work location, all personal usage must conform to our Code and not interfere with our job responsibilities or the safe operations of our network.

We can help protect our company networks and resources by:

- Downloading only authorized applications or software programs.
- Using strong passwords for computer and network access.
- Safeguarding electronic devices and storage media at all times.
- Reporting suspicious activity or stolen equipment as soon as we become aware of it.
- Avoiding the use of company networks to access personal email services and to circulate or access inappropriate or offensive material or websites.

Questions & Answers

Q Sam reads a blog that reviews products in our industry. In one post, the blogger is very critical of an Olin product. Sam thinks the comments are inaccurate and unfair and decides to type a response. Is this the best way to handle the situation?

A No. Unless Sam is an authorized Olin spokesperson, he should not try to respond to negative comments about our company or our products on his own. He should notify an Olin Communications contact so that an authorized spokesperson can determine the most appropriate response.

Use of Social Media

Social media is transforming the way people and businesses communicate. In addition, the social media landscape is constantly changing and expanding around the world. Social media benefits us by allowing us to participate in a vast number of online forums, learn from each other and our industry contacts, and make connections. However, because communications made public on a social media site are instantaneous and permanent, inappropriate use of social media can expose our company – and us – to significant liability. That's why it's important to use the highest care in protecting our company's confidential information, data, and reputation.

Here are some guidelines we should consider when using social media, whether for business or personal reasons:

- Know and follow our Code. Our online activities must follow the same rules that apply to us at any other time.
- Use common sense. Remember that the Internet is a public and permanent place.
- Preserve our network resources. Limit the use of social media during work time to business-related activities.

- Do not speak on Olin’s behalf unless you have been specifically authorized to do so. Clearly state that your opinions are your own and do not necessarily reflect those of our company.
- If you post comments endorsing our products, clearly disclose that you work for Olin. Never use aliases or otherwise pretend to be someone you are not.
- Be alert to disparaging posts about our company’s products and services, but do not respond on your own. Notify the Olin Communications Department or Law Department and let an authorized Olin spokesperson handle the situation.
- Protect our company’s confidential information. Do not post customer information, pricing, trade secrets, financial information, business plans, or other commercially sensitive or proprietary information.
- Be respectful. Never post obscene, threatening, criminal, or harassing comments, or any comments that disparage employees, customers, suppliers, or other business partners. Content that may be acceptable in some countries or regions may be offensive in others.
- Respect copyrights. Do not post intellectual property owned by others unless we have permission from the owner. This includes photographs and images found on the internet.

Our IT and Security departments work to protect our information and company networks from loss, interruption, virus attacks, and other compromises or legal issues. In order to do so, any information transmitted through Olin’s networks, including social media posts or activity, is subject to review by Olin unless prohibited by local laws or regulations. See Olin’s corporate policies and procedures regarding Information Technology, Corporate Communications, and Social Media for further details.



Questions & Answers

- Q** David was part of an Olin team that developed an innovative and confidential new production process. David is proud of the role he played and wants to explain to a friend at another company in our industry how the new process improves on the old one. Can he tell his friend about it?
- A** No. Sensitive information related to our business must be protected from unauthorized disclosure. David should not discuss the process he helped to create with people who do not have a business reason to know – and especially not with someone who works for another company in our industry. By safeguarding this information, David is protecting our trade secrets and helping us to remain competitive.

Confidential Information

Some of our company’s most valuable assets are intangible and include our trade secrets and confidential company information. We must protect these assets and not disclose them to outsiders unless there is a clear business purpose or justification for the disclosure, and a company-approved confidentiality agreement has been signed by the recipient. In addition, we must take care to avoid discussing business matters within hearing distance of unauthorized personnel, including co-workers, family, and friends.

Some examples of confidential information include:

- Undisclosed financial information and earnings reports
- New product offerings
- Customer lists
- Product costs and volumes
- Marketing, pricing, or service strategies
- Procurement plans
- Commercial business negotiation information
- Capital requirements and plans
- Merger, acquisition, divestiture, or business plans
- Confidential technical data
- Confidential product performance information
- Proprietary or classified government information
- Proprietary computer software
- Supplier and subcontractor commercial information

Intellectual Property and Copyrights

Intellectual property laws provide an incentive for the creative efforts and research and development that support innovation. These laws make it possible for companies like Olin to invest in new ideas and processes.

Our intellectual property consists of our patents, copyrights, trademarks, and trade secrets, as well as designs for products and software programs created by other companies that are copyrighted or otherwise restricted.

We must vigorously protect our own intellectual property rights as well as the rights of others. We can do this by fully documenting product development research and using appropriate company trademarks and copyright notices on all correspondence, articles, manuals, or other papers.

In order to protect the intellectual property rights of others, we must:

- Use only authorized copies of software.
- Photocopy magazine or journal articles or other publications only when we have the authority or license to do so – and make only as many copies as needed.
- Avoid asking new hires for trade secrets belonging to their former employers.
- Check carefully to be sure we have authorization to use trademarks belonging to other companies.
- Take care to mark products with the right patent notice.

Disclosing Information to the Public

Olin strives to communicate with the public in an accurate and consistent matter. To be sure that we comply with all public disclosure laws and regulations and protect the interests of our company, statements to the public or media on behalf of the company may only be made by those employees specifically authorized to be company spokespersons.

Inquiries from investors or security analysts, either verbal or written, should be referred to Olin’s Investor Relations office. Inquiries relating to other matters, including requests for information from the media, should be directed to an Olin Communications contact.

To Learn More: A current list of Investor Relations and Media contacts are available in the Contact section of Olin’s website at www.olin.com and the “*Additional Corporate Resources*” section of this Code.



Questions & Answers

Q Neil gets a phone call from a journalist who wants to talk about our industry. When the journalist suggests that the industry outlook is poor, Neil tells her that it isn’t true. On the contrary, Neil says, he heard just this morning that Olin is planning an expansion of the facility where he works. How should Neil have handled this situation?

A Neil should have referred the journalist to a Communications contact and promptly advised the Communications contact about the media inquiry. Even though the journalist contacted Neil, he is not an authorized spokesperson for the company. Communications is responsible for communicating to the media in a way that is consistent with company policy and regulations on public disclosure. Further, Neil should not have told the journalist about the possible expansion, which is confidential company information until it is officially announced to the public.

Integrity in Recordkeeping and Reporting

Accurate Recordkeeping

Our company's documents and electronic files are important assets, and their accuracy and storage are important for many reasons. Many records provide the basis for accounting information or are needed to meet regulatory requirements. Other documents (such as safety reports, timecards, sales projections, and many others) contain data and information critical to the continuity of our business or the preservation of our legal rights.

Company records exist in many formats, including voicemails, paper documents, email, and electronic files stored on computers, disk, mobile phones, or any other mediums (CD, DVD, USB data storage devices, mobile devices, etc.) that contain information about our company or its business activities.

We must all understand and follow Olin's records management policies. It is a violation of our Code to falsely sign, create, or modify information on any record or document or to intentionally make a false or exaggerated statement to anyone. We must never tamper with company records or remove or destroy them prior to the dates specified in our Records Retention Rules. In addition, records that have been put on "legal hold" by Olin's Law Department must be preserved until further notice.

Integrity in Financial Reporting and Controls

Each of us is responsible for the integrity and accuracy of business documents, communications, financial reports, and records. This information is important for managing our business and our obligations to suppliers, distributors, government regulators, investors, creditors, and our customers.

Olin is committed to full, fair, accurate, and timely disclosure in all reports and communications with government agencies and the public. All accounting information must reflect actual transactions and conform to generally accepted accounting principles. In addition, Olin maintains systems of internal accounting controls to ensure appropriate authorization, recording, and protection of our company's assets. As employees or contractors, Olin's internal control systems should never be intentionally circumvented.



INCORRECT

Lily uses her company credit card to buy food for meetings at her worksite. After working late, she retrieves her two children from school, takes them out to dinner, and knowingly uses her company credit card. She submits the expense as business meals, and her manager quickly approves the expense.

EXPLANATION

Both Lily and her manager acted inappropriately in this situation. Personal expenses should never be billed to the company. The manager also needs to review the receipts and expense report, only approving legitimate business expenses for legitimate participants or attendees. Integrity means we do the right thing, even when we do not think we will be caught doing the wrong thing.



CORRECT

Jan accidentally uses her company credit card when getting gasoline for her car. When Jan prepares to submit the expense, she sees the mistake and works with her manager and Accounts Payable to correct the issue and pay for the personal expense.

EXPLANATION

Mistakes happen, however it's important to admit to the mistake, correct it, and learn from it. That is what integrity in action looks like. If you have questions or concerns, talk with your manager, a higher-level manager, or see the section titled "Encouraging Speaking Up and Responsibility to Raise Issues and Concerns" for a list of where you can go for help, located in this Code of Conduct.

Reporting Financial Issues or Questions

If we encounter questionable accounting or auditing practices, they should be reported immediately to our manager or a higher-level manager in our organization and also to Olin's Vice President, Internal Audit. We may also report accounting or auditing concerns to the Ethics & Compliance Office or Olin's 24-Hour Help-Line service on a confidential and, where allowed by law, anonymous basis.

All books and records of our company are subject to review and independent audit. If asked to respond to requests by internal auditors, legal staff, independent accountants, or special counsel, our responses must be complete and truthful. We must disclose all relevant – or potentially relevant – information, even if the request is not specific as to what information is required.

Questions & Answers

- Q** Victor, who works in Accounting at Olin, notices an invoicing error – but since it is in our company's favor, he decides to ignore it. Is this a problem?
- A** Yes. Victor should bring this error to his manager's attention so that it can be corrected. Keeping accurate books and records is an important responsibility that we all share.



SECTION 4

Our Commitment to
Stewardship, Sustainability,
Quality, and Communities



Stewardship and Sustainability in Everything We Do

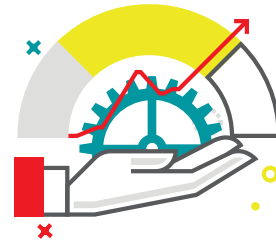
At Olin, we understand that integrating stewardship toward people and the environment in a sustainable manner is paramount in our privilege to operate. Our commitment to sustainability focuses on our four pillars, which are defined by issues material to Olin that are aligned with the UN Sustainable Development Goals. This helps us advance the opportunities where our impact on the planet, our operations, and our people and communities is most meaningful. Olin products enable clean water, food preservation, wind energy, and wildlife conservation. We rely on the efficient use of energy and other natural resources. We seek opportunities to reduce waste, while also responsibly using and reusing resources without compromising quality.

Our Values drive our sustainability commitment, as we work together to:

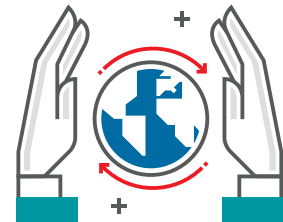
- Act With Integrity as a Responsible Corporate Citizen, complying with regulations and standards, and partnering with our customers and stakeholders around the world to protect the communities where we work, live, and serve.
- Drive Innovation and Improvement by challenging ourselves to find innovative ways to optimize our operations, improve energy efficiency, and reduce waste.
- Lift Olin People by treating others with mutual respect, and working in a way that protects the health and safety of ourselves and our coworkers.



ENERGY AND CLIMATE
MINDFULNESS



RESOURCE EFFICIENCY



PRODUCT
SUSTAINABILITY
AND COMMERCIAL
OUTREACH



EMPLOYEE AND
COMMUNITY CARE

Olin's Environmental, Health, Safety, and Quality Production Practices

Product Quality

The integrity and quality of our products and services are fundamental to the reputation of our company and the ultimate success of our businesses. All of our products and services must meet appropriate inspection, testing, and quality criteria in accordance with contract and government requirements.

With respect to quality and testing, we have the following responsibilities:

- Take personal responsibility for ensuring product quality.
- Know which tests must be performed.
- Know how to carry out these tests.
- Record test results accurately.

We must complete all test documentation accurately and promptly.

We must **never**:

- Falsify, alter, or distort any inspection or test documentation or software.
- Improperly or erroneously record inspection or test results.
- Mislead any customer's representative.
- Falsely certify that required inspections or tests were performed.
- Use incomplete or improper inspection or testing protocols or procedures.

Questions & Answers

- Q** Lauren works in the Quality Assurance Department. A contract that she works on specifies some particularly rigorous product testing to pass inspection. It includes one test that, in Lauren's experience, almost never reveals any problems. Because the deadline to ship the product is very tight, Lauren wants to skip the test this week. Would that be okay?
- A** No. Lauren must make sure that her team conducts – without exception – all the testing required by the contract. Even if the test rarely reveals a problem, Olin is obligated to perform all inspections, testing, and quality assurance procedures, exactly as specified in the contract, unless a change is authorized by the customer.



Environmental, Health, Safety, & Security Policy

Olin is committed to the guiding principles of the global Responsible Care® initiative to drive continuous improvement and achieve excellence in environmental, health, safety, and security (EHS&S) performance. Our Company Values are the foundation of our culture: Act With Integrity; Drive Innovation and Improvement; and Lift Olin People. These Values are also reflected in our EHS&S policy, the related procedures, and practices. Olin leadership visibly performs and guides the organization to conduct business in a manner that protects and increasingly benefits our employees, business partners, and the communities in which we live. All employees are accountable to embody Responsible Care through active engagement in the Olin EHS&S process.

Olin will, in its worldwide activities:

- Commit to meet or exceed all applicable legal, regulatory, and other requirements.
- Establish objectives and targets that drive continual improvement and foster sustainable protection for the environmental, health, safety, process safety, distribution, and security processes affecting our people, products, operations, and services.
- Relentlessly pursue ZERO injuries and adverse environmental and health impacts through a robust assessment of internal and external risks and opportunities and development of management systems to address them.
- Share information openly with our stakeholders regarding our EHS&S policies, practices, and performance and evaluate their input.
- Design and construct new facilities and upgrade or modify current facilities in such a manner as to ensure excellent process safety management and address sustainability and efficiency in our operations.
- Be a good steward of Olin products and materials over their life cycle to ensure prudent and safe development, sourcing, production, use, handling, transportation, and disposal/recycle.

Each of us is responsible for supporting Olin's commitment to EHS&S excellence. We can do this best by understanding the requirements that apply to our jobs and following them without deviation. Everyone has a role to actively engage in the EHS&S process.

Questions & Answers

- Q** A safety incident happens at a plant, and an employee gets a minor cut on their hand and needs to get a bandage. The accident is not something that is likely to happen again and is not the result of an unsafe condition or process. The site is right at the limit of the plant's safety targets for the year, and if they report the safety incident, then they will miss the annual target. A supervisor calls the shift employees together and asks everybody to agree not to report the incident because the bandage fixed the issue, and the accident should not happen again. The safety procedure states that the safety incident must be reported. What should employees do?
- A** They must report the safety incident. Safety, and the integrity of our safety program, are important to the company's success, just as important as any production or targeted goals for the year. The supervisor needs to report the safety incident, and if they don't, then the employees should remind the supervisor of the procedure and the need to report. Anybody who learns about an unreported safety incident needs to notify the appropriate safety representative, and if they think that an incident is being hidden, they can always talk to a higher-level manager at the site, the safety representative, the Human Resources representative, Ethics Advisor or Ethics Officer, the Ethics & Compliance Office, or even contact the Olin Help-Line. Act With Integrity means we do the right thing every time, especially regarding safety issues.
- Q** The environmental control on a piece of manufacturing equipment is not working properly, and it will be several days until the replacement parts arrive. Julia's manager says she should just disable the device so that she can keep working. She questions whether this is a good idea, but he threatens to suspend her. What should Julia do?
- A** Julia is right. We should never bypass, disconnect, or disable any safety device, environmental control, or monitoring equipment without approval from the plant environment officer or safety officer. Our safety and the safety of our co-workers, our environment, and our facilities depend on these systems. Julia should report this threatening behavior to a higher level of management or any of the other resources listed in this Code.

SECTION 5

Avoiding Conflicts of Interest



Ensuring No Conflicts of Interest

Each of us, at every level of the company, must avoid situations that place our personal interests in conflict with the interests of Olin. We need to be loyal to Olin's interests. This means that our personal financial, business, and other activities must never make us biased or partial in a way that would negatively affect our work for Olin. In order to maintain our company's good reputation – and our own – we should avoid situations that raise even the suggestion of a conflict of interest and disclose any potential conflict to our manager as soon as we become aware of it.

Potential conflicts of interest should be referred to an officer, division leader, or the Ethics & Compliance Office for determination as to whether there is a conflict. Such managers are required to regularly complete a Conflicts of Interest Questionnaire and disclose any such conflicts. Further details regarding conflicts of interest can be learned in Olin's Conflicts of Interest Policy, or by reading below.

Outside Employment and Second Jobs

We must be careful to avoid a conflict of interest when we seek secondary employment outside of Olin. If we take a second job or perform services for another company, this work must not interfere or conflict with our responsibilities at Olin. In addition, Olin policy does not permit us to work for or provide services to any Olin competitor, customer, or supplier (or any company seeking to become an Olin competitor, customer, or supplier) without prior approval from management. This policy also applies to any family member, as defined below.

A **family member** includes a spouse, child, sibling, parent, grandparents, stepchild or stepparent, as well as mother-, father-, son-, daughter-, brother- or sister-in-law, and any other person living with you, except tenants and household employees.

In addition to outside employment with other companies, independent business activities, such as operating a part-time or "side" business, have the potential to create a conflict if the business activities compete with Olin's interests or reflect negatively on Olin. For this reason, if we have a side business that we fully or partially own, the business may not act as a supplier to Olin or to a current or potential Olin competitor, customer, or supplier without advance disclosure and approval.

Officers of Olin Corporation may not serve as a director, officer, employee, partner, consultant, agent, or representative of a business concern not affiliated with Olin without prior approval of Olin's Board of Directors.



CONFLICT

Stephen works weekends in a maintenance company he co-owns with a friend. He would like to do contract work for an Olin manufacturing facility because it would boost his business and save Olin money.

EXPLANATION

This would be a conflict of interest for Stephen. If the situation changed so that the arrangement was not favorable for both Olin and his maintenance company, he would have to choose between the best interests of the two companies. We should avoid ever getting into that position.



NOT A CONFLICT

Sarah is thinking about getting a second job at a local business. If the second job does not prevent Sarah from devoting the time and effort required to adequately perform the duties of her job at Olin, it should not be a problem.

EXPLANATION

If Sarah has questions, she should contact her manager, Human Resources Department, or the Ethics & Compliance Office to discuss the situation before accepting the job.

Working With Family and Friends

In certain situations, the work activities of family members can create a conflict of interest. To avoid conflicts, Olin does not generally allow the direct supervision of a family member. Where family members work in the same department or location, Olin makes sure that job duties and overtime assignments are based on objective criteria and pay decisions, and job performance evaluations are handled by an independent person.

We should also be aware that a conflict of interest may exist, or appear to exist, in situations where a family member works or performs services for an Olin competitor, customer, or supplier, especially if we or someone who reports to us has business dealings with the company or family member. We should always report questionable situations to our manager as soon as we become aware of them to avoid even the appearance of a conflict in our dealings with family.

Ownership or Investments in Other Companies

Olin respects our right to invest in other companies as long as these financial interests do not affect our judgment or activities on behalf of Olin or jeopardize Olin's reputation. For this reason, neither we nor any of our family members, as defined previously, may have a significant investment in any business concern that does or seeks to do business with our company, or any competitor of our company, unless it has been fully disclosed in writing to management and a determination has been made that a conflict of interest does not exist. Also, even in the absence of a financial interest in another business organization, we should be aware that the potential for a conflict of interest may exist if we or a family member receives a significant benefit such as substantial commissions or bonuses from another organization doing business with Olin.

A "significant financial interest" is a 10% or more ownership interest in, involvement with (including as a director, officer, or partner) or obligation to or from any business organization that does or seeks to do business with Olin. A "business organization" includes any not-for-profit entity to which Olin makes contributions and any competitor of Olin.

Competing With Olin or Taking Business Opportunities

We are expected to promote Olin's interests when the opportunity to do so arises. This includes situations where we personally benefit from an opportunity that we developed or learned about during our employment with Olin.

For example, developing an opportunity related to any current or prospective Olin business without Olin's knowledge and consent would be a conflict of this type. A conflict of interest may also exist (even if we do not personally benefit) if we were to offer the benefits of the opportunity to another person or organization other than Olin.

Memberships on Boards and Committees

Olin encourages us to participate in professional organizations and community activities. However, our participation must not jeopardize our company's reputation or distract us from the performance of our jobs. We are not required to obtain approval for serving on the board of a nonprofit organization as long as the organization does not receive contributions or other payments from Olin, and our activities do not conflict with our job responsibilities or reflect negatively on Olin. Advance approval is required for service on the board of directors of any other organization.

Questions & Answers

- Q** Jon works in maintenance and plans the work that is outsourced for contractors, but procurement chooses the winning contractor. Jon's brother works for an electrical contractor, so Jon submits a work plan that favors the skills and tools of his brother's company. Jon does not tell procurement about the relationship or that the requirements favor one contractor. Procurement does a competitive bid and gives the contract to the company that best meets the plan's requirements, so Jon's brother's company wins the bid. Is this a conflict of interest?
- A** Yes. Even though Jon is not the one negotiating or awarding the contract, this would be a conflict of interest in multiple ways. First, Jon should not favor one contractor over another as that negates a truly competitive bid process. Second, Olin's best interest should always be our first priority, and we need to remove ourselves or fully disclose bidding processes or planning where family or friends are involved.

Inside Information and Securities Trading

From time to time, we may have access to material inside information about our company or other companies with whom we do business. “Material inside information” is information that is not available to people outside of Olin, but that a reasonable investor would consider important.

Securities laws, local laws and regulations, and Olin policy prohibit us from using inside information to influence our own or anyone else’s investment decisions regarding Olin or any other publicly traded company. For this reason, we must be careful not to trade in any publicly traded securities, including Olin’s, whenever we believe that we are in possession of material nonpublic information. If we have any questions about whether we are in possession of material, nonpublic information, or if it is permissible for us to trade, please consult Olin’s General Counsel or Chief Financial Officer. We must also be careful not to “tip” anyone else, including family and friends, who could disclose the inside information to others. Tipping also applies to discussions in social media, including Internet bulletin boards, blogs, or chat rooms.

Further details can be learned within Olin’s Insider Trading Policy, but some examples of material inside information include:

- Unpublished financial results, reports, or projections such as earnings estimates or results, or a change in previously announced earnings estimates.
- News of a pending or proposed merger, acquisition, divestiture, or tender offer.
- Changes in top management.
- Changes in dividend policy, declarations of stock splits, or offerings of securities.
- Calls, redemptions, or purchases of Olin’s own securities.
- Changes in prices or demand for the company’s products, or changes in the costs of producing, transporting, or selling the company’s products.
- Unusual or large borrowing.
- Liquidity problems.
- Significant new products or services or other changes in operations.
- Commencement or settlement of a major claim or lawsuit.
- Gain or loss of a substantial customer or supplier.
- Significant litigation or governmental investigation or other governmental action.
- Industry information (i.e., prices, volumes, or other conditions affecting our business).
- Initiation or settlement of labor negotiations or disputes, strikes, or lockouts.
- Information relating to the company’s stock repurchase programs or their execution.
- Data privacy breaches or other cybersecurity incidents.

Questions & Answers

Q Peter hears confidentially from a friend in another department that Olin is negotiating to acquire a certain company. Peter thinks that Olin’s stock price will go up when the news is announced, so he decides that it would be smart to purchase additional Olin shares now. May Peter purchase stock now that he has learned about this potential acquisition?

A No. Peter must not make any trades based on this nonpublic, material information. If he buys or sells stock in Olin now that he has learned this information, he will be considered to have traded based on that information, even if he believes the acquisition may not actually happen. Any nonpublic information that a reasonable investor would consider important when deciding whether to buy, sell, or trade a company’s stock can be considered inside information.



SECTION 6

Gifting, Anti-Corruption, and General Business Practices



Operating With Integrity

As part of our Core Value to Act With Integrity, we never resort to bribery or other corrupt practices. We believe in the excellence of our products, and we know that providing high-quality products is always the best way to win business. We also take our responsibility to follow all applicable anti-corruption laws very seriously.

All countries where we operate prohibit the bribery of their own public officials and many also prohibit the bribery of officials of other countries and commercial bribery. Although Olin is a U.S. company, it conducts business throughout the world. As such, we are responsible for complying with the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, the UN Convention against Corruption, the OECD Convention on Combating Bribery of Foreign Government Officials, and all applicable local anti-corruption laws.

Because the consequences of bribery can be severe – including criminal or civil penalties, fines, or termination of employment – we must each take care to know and strictly follow the anti-corruption laws applicable to our job duties. Further details can be learned in Olin’s Anti-Corruption Policy and related procedures.

Questions & Answers

Q Jan works in sales, and a customer says that if she gives them U.S. \$2,000 or a mobile phone, that they will let Olin bid to sell to their company. Without the gift, Olin will be banned from bidding. What should Jan do?

A Jan should refuse and report the incident to her manager. Payment of this type could be considered a bribe under Olin’s Anti-Corruption Policy, so this would not be allowed for commercial customers, and especially not allowed for any customer that is connected to a government-owned company or as part of a government entity. We would respond the same way if a government official or customer were holding and would not release our products in port or at their warehouse, or generally stopping our sales or shipping in exchange for a gift or bribe. If something like this happens, please contact the Ethics & Compliance Office or Law Department, and they will help you address the situation.

Definitions and What We Need to Keep in Mind

Bribery of public officials is the direct or indirect offer, promise, payment, solicitation, or acceptance of anything of value to or from a public official for the purpose of influencing the official’s actions in a way that helps Olin obtain or retain business or other advantages.

Commercial bribery involves a situation where anything of value is given to a current or prospective business partner with the intent to obtain business or influence a business decision.

We must avoid participating in public or commercial bribery – or even the appearance of any such behavior – in all of our business dealings.

“Anything of value” is very broadly defined and can include things such as cash, gifts, meals, entertainment, travel and lodging, personal services, charitable donations, political contributions, business opportunities, favors, or offers of employment. Bribery has no minimum monetary threshold, so any amount could be considered a bribe.

A public official is also broadly defined and includes any person, regardless of rank or position, acting in an official capacity for:

- Any legislative, administrative or judicial body, including any government department, agency, military branch, court or legislature, as well as customs or tax authorities.
- Any commercial enterprise that is partially or wholly owned, operated, or controlled by the government, such as a nationalized corporation or industry.
- Any political party, including party officials or candidates.
- Any member of a royal family.
- Public international organizations, such as the World Bank or the Red Cross.

In addition to bribery payments, we should also avoid the following types of corrupt payments:

A kickback is an agreement to return any sum of money to another party in exchange for making or arranging a business transaction.

Facilitation payments are small payments to public officials to secure or expedite the performance of routine services or actions that the company is otherwise entitled to receive, such as mail service, basic utilities like phone service, power, and water or immigration and work permits. Olin policy prohibits facilitation payments by our employees, officers, directors, consultants, agents, distributors, representatives, and other third parties. If we are requested to make a facilitation payment, notify Olin’s Ethics & Compliance Office immediately and await further instructions.

Providing and Accepting Gifts and Entertainment

Gifts

Although exchanging gifts can help to build strong working relationships with our various business partners, it also has the potential to create a conflict of interest, or at least the appearance of a conflict. For this reason, any gifts that we offer or accept in a business relationship must be reasonable, infrequent, and valued at less than U.S. \$100. We should be attentive to the fact that what may be considered reasonable by law or custom in some countries might be considered extravagant in others. If ever in doubt, consult the Ethics & Compliance Office. Gifts may include tangible merchandise, such as specialty items bearing a company logo, gift baskets, specialty food items, or gift certificates redeemable for meals, goods, or services.

Gifts also include tickets to entertainment venues, such as sporting, cultural, or other events when the host or provider is not in attendance. For example, providing football tickets to a customer who will not be accompanied by an Olin employee is not entertainment; it is a gift. Accepting tickets to a concert unaccompanied by the Olin supplier or potential supplier who provided them is considered a gift. In both of these situations, the offer of entertainment would be considered a gift and subject to Olin's gift limitation.

Certain gifts are *never* acceptable:

- Gifts of anything of value for the purpose of influencing the receiver to misuse his or her position in a way that benefits Olin.
- Gifts that are solicited or offered in exchange for personal gain or unfair business advantage.
- Gifts in cash or cash equivalents, such as stocks, bonds, stock options, loans or certificates redeemable for cash.
- Gifts that are illegal, sexually oriented, or would violate our commitment to mutual respect.

Occasionally, a gift that exceeds the U.S. \$100 limit may be offered or accepted in certain situations. Usually, these situations involve a group event attended by an Olin employee and representatives of one or more other companies where the item is provided to all attendees. There may also be a situation where a more expensive gift item is presented in recognition of a special event or milestone. However, any gift that exceeds the U.S. \$100 limit must be approved by the employee's supervisor and then by a Corporate Officer, or, for employees outside the United States, the General Manager for the employee's region. If you have questions, the Ethics & Compliance Office or a local Ethics Advisor or Ethics Officer are our best resources.

There may also be circumstances where a gift of more than U.S. \$100 may be won in connection with a random drawing at an event or competition (e.g., a golf outing). In such cases, we may retain the gift so long as the drawing or competition was available to all participants, the drawing was truly random and won fairly, and the prize is reasonable in value. Such prizes must be disclosed to our supervisor, and in some cases, we may be requested to decline the prize even if otherwise allowed by Olin's policies or procedures.



Questions & Answers

- Q** Angie receives a gift from an important supplier that exceeds the U.S. \$100 limit. What should she do?
- A** At times, we may receive an unannounced gift from a supplier or other business partner that exceeds Olin's gift limit. In this case, Angie has the option of returning the gift with a note explaining Olin's policy on gifts, turning it over to Olin for display, using it in an employee giveaway, donating it to a charitable organization or, if the item is a perishable food item, sharing it with all members of her department. However, keeping a gift that exceeds Olin's gift limit would require approval of the Chief Ethics & Compliance Officer.

Meals and Entertainment

We may offer or accept meals, hospitality, and entertainment in connection with a business relationship as long as they are reasonable and customary with respect to frequency and cost, the provider is in attendance, and they are not given or received for corrupt purposes. If the provider is not in attendance, anything offered or given is considered a gift and is subject to Olin’s gift limitation.

“Reasonable and customary” means that the meals, hospitality, or entertainment has a legitimate business purpose and is:

- Consistent with acceptable business practices for the industry and geographic location.
- Infrequent in nature.
- Not lavish or extravagant.

To be in connection with Olin business, the meal or entertainment must meet one of the following requirements:

- Relate to the promotion, demonstration, or explanation of Olin’s products or services.
- Relate to Olin’s or a business partner’s execution or performance of an Olin contract.
- Directly relate to the creation, strengthening, or continuation of a business relationship and business discussion with the business partner.

In addition, since we are representing our company, the entertainment must not violate Olin’s Code or the business standards of the other party, nor include any establishment or activity that would reflect negatively on Olin. An example of inappropriate entertainment is sexually oriented entertainment or entertainment that exploits anyone’s ethnic identity, race, or religion. Please contact the Ethics & Compliance Office for advice if you are concerned or have questions about a possible gift.

Offers of Travel and Lodging

We may not accept gifts of commercial transportation, lodging, or other living and travel expenses unless the expenses are reasonable and in connection with Olin business, the employees in the offering party are present for the business, and the activity is approved in advance by a Corporate Officer or the Ethics & Compliance Office. Such approval is not required in the case of the reasonable cost of transportation within a city to attend meetings, entertainment, and meals, such as cab fares or public transportation costs.

Spouse and Partner Expenses

Generally, we may not expense spouse and partner expenses as business expenses. In rare cases, Olin may choose to reimburse us for such expenses where a Corporate Officer or the Ethics & Compliance Office has pre-approved such expenses after determining that Olin would not be best represented without the spouse or partner. We must receive and maintain written authorization from a Corporate Officer or the Ethics & Compliance Office, indicating the specific business benefit achieved by their attendance.

Questions & Answers

- Q** Maria manages several of Olin’s suppliers. Maria likes to meet in person whenever possible, especially when she is working with one specific supplier. Whenever she visits their offices, the supplier takes her to an expensive restaurant, and several times a year, they invite her to concerts or sporting events. Recently, Maria has been going there every month. Could Maria be violating our meals and entertainment policy?
- A**

Possibly. Occasional, moderately priced restaurant meals and other entertainment can foster goodwill between our company and a business partner. However, we should keep in mind that accepting entertainment from a contractor or supplier company on a frequent basis may become – or appear to become – a conflict of interest. Maria should discuss these invitations from the supplier with her manager to make sure that she is following our policy. If there are any doubts, Maria and her manager should contact the Ethics & Compliance Office.

Be sure to review
Section 7 for more
information on special
concerns when dealing
with public officials.

Third-Party Agents, Distributors, and Representatives

Just as we do not pay bribes, we may never hire or ask a third party to do something that we may not ethically or legally do ourselves. A third party may be a consultant, agent, distributor, representative, contractor, joint venture partner, accountant, attorney, or any other business partner operating on Olin's behalf.

Employees and third parties alike should refuse any request or demand to participate in illegal conduct. If requested to make an improper payment as part of a business transaction, we must decline to make the payment, report the matter to our manager or Olin contact, and the Olin Ethics & Compliance Office, and wait for further instructions from the Olin Ethics & Compliance Office. Our reputation for integrity is more important than the profit from any contract or individual business relationship.

Watch for these signs that a payment may be corrupt:

- A request that a commission be paid in cash, in another name, or to an address in a different country.
- Unexplained large expenses on a travel and entertainment expense report.
- An agent is demanding a higher than normal commission for a transaction.
- Any agent or salesperson who says they are working with a government official to give our company the contract.
- References to family members or friends helping Olin when those individuals are government officials.

Watch out for the following “warning flags” when selecting third parties:

- A history of corruption in the country where a third party is being hired.
- Third parties with family or other relationships that could influence the buying decision.
- Third parties with a reputation for corruption or improper conduct.
- Unusually high commission requests.
- A third party who makes an approach near the award of a contract and indicates a “special arrangement” with a government official, political party, or other official.
- A customer who suggests that an Olin bid be made through a specific agent or representative.



Questions & Answers

- Q** Nadia and her manager work closely with a third party that is helping Olin bid for a contract. Nadia accidentally overhears her manager on the phone, telling the agent that he can record something as a travel expense. She thinks that her manager is discussing a corrupt payment. What should Nadia do?
- A** Even if Nadia has no proof that the payment is corrupt, she should report her suspicions to a higher level of management and the Olin Ethics & Compliance Office. She may also report her concern confidentially or anonymously, where permitted by law, to Olin's Help-Line. Olin does not tolerate bribery under any circumstances, and our company could be liable for the actions of our agents and other third parties. We cannot avoid liability by “turning a blind eye” to violations that may be going on around us, and we must never falsely record bribes as if they were legitimate expenses.

Fair Competition and Antitrust

We believe in free and open competition. Though competition laws vary by country, in most of the countries where we operate, strict laws are in force that are similar to antitrust laws in the U.S. and competition laws in the European Union.

We must all understand the basic requirements of the competition laws that apply to our business activities. Penalties for antitrust and other competition law violations can be severe, including jail time and large fines.

Never talk to or exchange information with competitors or with customers, distributors, or suppliers who are also competitors about:

- Prices or credit terms.
- Suppressing, rotating, or submitting complementary bids.
- Costs, profits, or margins.
- Dividing markets, orders, or customers.
- Limiting production or sales volume.
- Distribution methods or allocations.
- Boycotting a supplier, customer, or competitor for commercial reasons.

In addition, we must always consult with Olin's Law Department before proposing or entering into any agreements or understandings that:

- Require suppliers or customers to conduct business with Olin before we will purchase from or sell to them.
- Restrict a customer's choices in using or reselling our products or services.
- Require a customer to purchase one Olin product or service as a condition of purchasing another Olin product or service.
- Restrict any party's freedom to conduct business with or produce or provide any product or service with any other party.
- Restrict the freedom of a licensee or licensor of any patent, copyright, or licensing arrangement.

Participation in Trade Associations and Conferences

Olin is a member of various industry and trade associations in which employees of our company meet with employees of our competitors to discuss issues of common concern to the industry. Because these meetings involve contact with our competitors, they raise issues of compliance with antitrust and competition laws. If we attend trade association meetings or serve in any capacity on committees, we must avoid any formal or informal discussion regarding prices, discounts, terms and conditions of sale, exclusion of members or standardization of terms, product specifications, or warranties. If we become aware of any discussion of these issues at a trade association meeting, we should immediately leave the room and contact Olin's Law Department.

Questions & Answers

- Q** Bill was asked by an Olin competitor to agree to alternate bids for new contracts. One time Olin would bid the lower price, and the next time the competitor would bid the lower price. Can Bill discuss alternating bids with a competitor?
- A** No. We must never discuss rotating or alternating bids or other forms of bid-rigging with any competitor. If a competitor ever initiates a discussion about any form of bid-rigging, stop the conversation and walk away. Report any attempt to discuss pricing plans to the Law Department immediately.



Gathering and Using Competitive Information

Learning about our competitors is good business practice, but it must be done fairly and ethically and in compliance with all laws and regulations. We should seek competitive information only when there is a reasonable belief that both the receipt and the use of the information are lawful. Competitive information includes anything related to the competitive environment or to a competitor's products, services, markets, pricing, or business plans.

Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the Internet. We may also gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information) and by obtaining a license to use the information or actually purchasing the ownership of information.

We must never seek or use:

- Information obtained by unethical or illegal means, including theft, bribery, eavesdropping, or unauthorized recording of a customer or supplier.
- Proprietary information that has been copied, drawn, or photographed.
- Information obtained in exchange for compensation, employment considerations, gifts, or anything else of value.
- Information about a former employer solicited from a new hire.
- Information containing technical or engineering data that may be protected by trade secret laws.

Questions & Answers

Q When Craig receives an email from one of his newer customers, he finds an attachment with detailed information about an unannounced price increase from one of our competitors. Craig realizes that the email and attachment have been forwarded to him by mistake. Clearly, this could be useful information. What should Craig do with it?

A **Craig should not use this information or share it with anyone else, as it was not legitimately obtained. Craig should let the sender know that the email and attachment were not sent to the intended recipient and that he will delete the information. Craig should also let his manager and the Olin Law Department know about the incident immediately.**

Participating in the Global Marketplace

We operate in many countries around the world. As a global company, there will be times when local laws and customs may conflict with each other or with our Code and policies. If this situation occurs, always seek advice from a manager, the Law Department, Olin's Ethics & Compliance Office, or another resource named in this Code as to which standard to follow.

Those of us who engage in international business are responsible for knowing the laws and regulations of countries in which we operate as well as all applicable Olin policies. If we have any questions about which law, regulation, or policy to follow, we should contact Olin's Law Department for further information and guidance.

Import and Export Restrictions

As an international company, Olin ships products and materials across country borders on a regular basis. In all of our business activities, we must obey all applicable laws on imports and exports.

To be clear, an "export" can be any product, software, technology, or piece of information that we ship or transmit across borders. Technology, software, or information that is provided to a citizen of another country, or an employee of a foreign company acting on behalf of that foreign company, regardless of where the person is located, can also be considered an export.

We should all be aware of and comply with international trade control laws and our company's policies, especially those of us who sell and distribute our products.

Trade Controls

The United Nations and many countries – including the United States and other countries where Olin operates – impose international trade controls to protect national security and domestic economies and to promote foreign policy. Trade controls affect our international transactions, including exports and re-exports of products, technology, and software, as well as imports, travel, new investments, and other financial transactions or dealings with sanctioned countries, regions, entities, or individuals. It is Olin's policy to comply with all applicable international trade controls that govern its business operations.



Accordingly, we must not engage in international transactions with persons or entities from designated sanctioned countries or regions without specific advance written authorization from the Olin Law Department, Export Compliance Department, or International Trade Operations. We must follow all applicable trade control restrictions in all of the countries where we operate. All transactions must be screened in advance to ensure compliance with U.S. and relevant local country laws, and that parties to transactions do not include any of the following:

- Embargoed countries or regions and individuals or entities listed on the applicable restricted party lists.
- Arms proliferation-related end-users or parties (persons or entities) named on the U.S. Department of Commerce, Treasury, and State Department restricted and prohibited lists.
- Any party known or believed to be acting in violation of relevant laws and regulations.

Questions about international trade controls should be directed to the Olin Law Department, Export Compliance Department, or International Trade Operations.

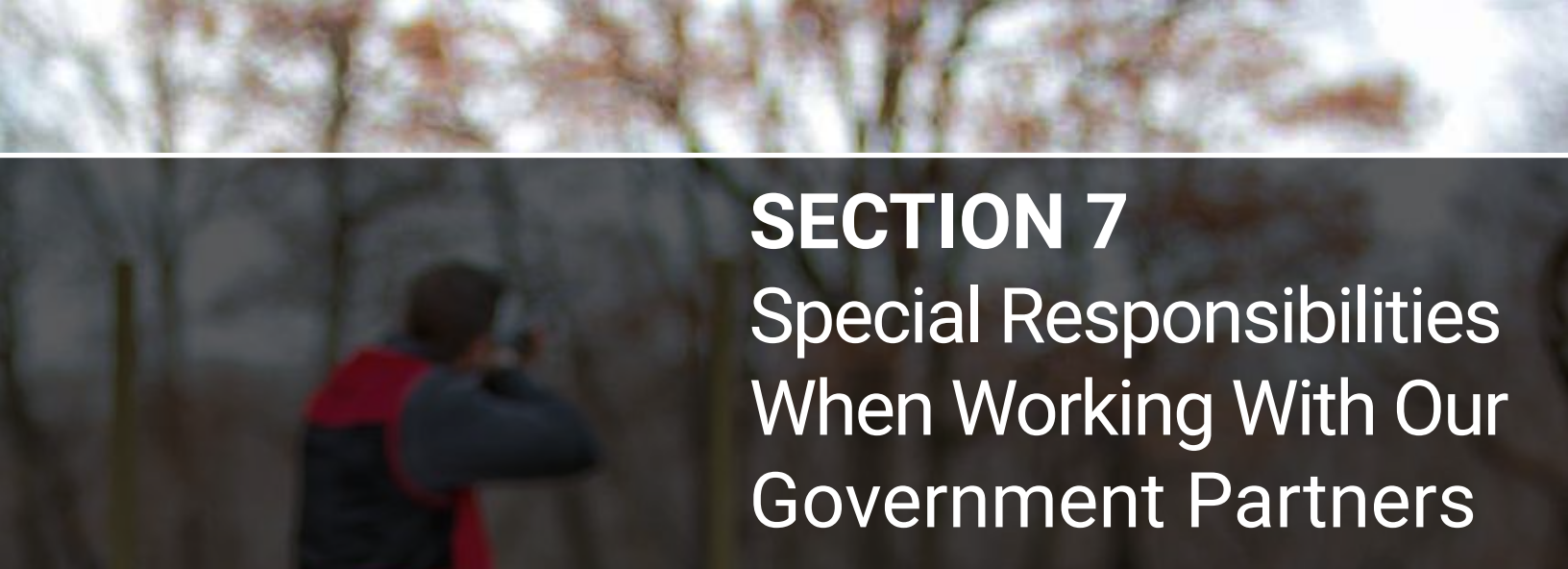
Boycotts

It is Olin's policy to comply with U.S. anti-boycott regulations. From time to time, we may receive a request – commonly as part of a contract – to boycott a certain country or company. As a U.S. corporation, Olin is subject to the anti-boycott provisions of U.S. law that require us to refuse to participate in boycotts that the U.S. does not sanction. Under the law, we cannot cooperate with any boycott request that is outside the sanctions described above. For this reason, we must not initiate any action, provide any information, or make any statements about countries, companies, or other entities that could be misinterpreted as cooperating with an illegal foreign boycott. All boycott requests must be reported immediately to Olin's Law Department.

Questions & Answers

Q Cynthia is an engineer at Olin. She has been working closely with Keiko, an employee of a Japanese company that is building a new machine for Olin. Keiko and her team want to make sure that the new machine will work seamlessly with Olin's existing systems, which are subject to trade controls. In response, Cynthia emails several technical documents that include schematics for some of our equipment. Was Cynthia right to email the technical documents?

A No. Before sending the technical documents, Cynthia must confirm that she is authorized to send this documentation and that Keiko is authorized to receive it. She must also obtain an appropriate export license, if one is needed. Even though Olin has contracted with Keiko's company for this project, that does not automatically qualify Keiko and her team to have access to information or technology that would require an export license or use of a license exception to export. When working with international vendors, always coordinate closely with Procurement or Purchasing and the Export Compliance Department or International Trade Operations.



SECTION 7

Special Responsibilities When Working With Our Government Partners



Respecting Our Government Agencies and Regulations

Olin operates in a highly regulated environment. Many federal, state, and U.S. government agencies, as well as governments outside the United States, regulate our business. For this reason, when we work with government agencies and public officials from any country or are involved in bidding on or providing supplies or services under a government contract, we must also keep in mind conduct that may be considered acceptable in the commercial sector may not be acceptable under government procurement laws or regulations. For example, the rules relating to gifts and entertainment in the government marketplace are far more restrictive and prohibitory than those that may apply commercially. In this regard, information on gifts and entertainment related to U.S. or international government officials can be found in the Gifts and Entertainment section of this Code.

Violations in the government marketplace can result in harsh consequences, such as individual and company fines, monetary penalties, termination of contracts, debarment or suspension from competing for government contracts, and, in egregious situations, criminal prosecution of the company or individuals.

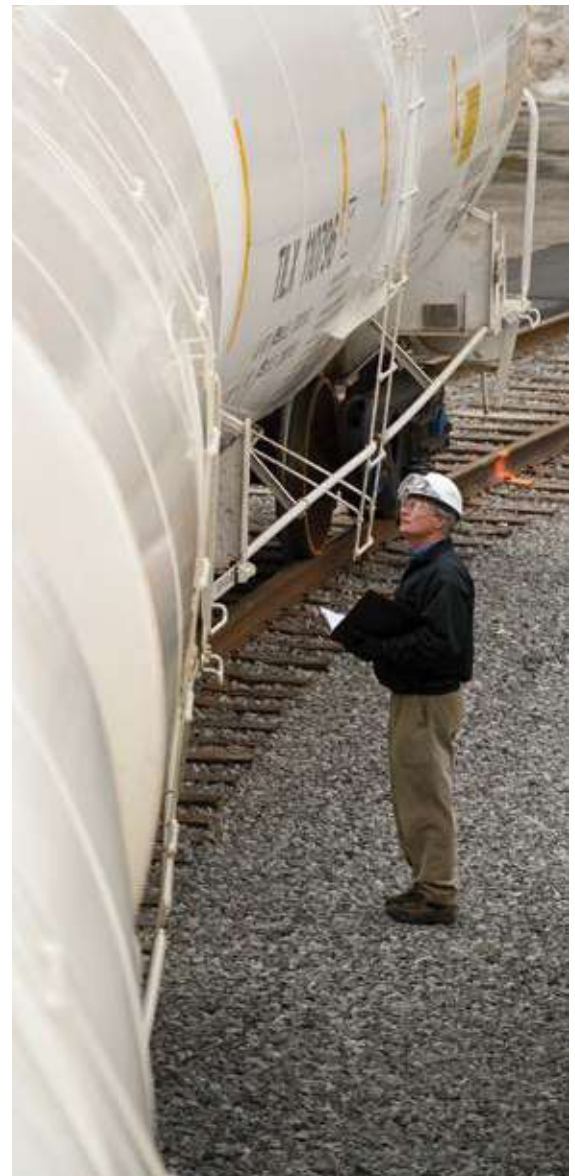
Ensuring Integrity in the Procurement Process

We must always ensure that we deliver our products and services in a manner that fully complies with government procurement laws and regulations. This is true, no matter which country's government or level of authority is involved. For example, for those of us working on U.S. government contracts, U.S. federal regulations, such as the Federal Acquisition Regulation (FAR) and the Defense Supplement to the FAR (DFARS), the Anti-Kickback Act, the Truth in Negotiations Act (TINA), and the Procurement Integrity Act (PIA) govern our interactions with U.S. government agencies.

Our Code gives an overview of some of these laws and policies. It is important to understand that these laws, regulations, and policies are complex. They also may vary from agency to agency. Therefore, if our job does or could involve government procurement, we must know and follow the special procurement rules that apply to our work.

Among other things, procurement laws and regulations may require:

- Accurate and complete tracking and billing of all labor and material costs.
- Faithful and strict conformity to all contract specifications and requirements.
- Precise and accurate accounting of research and development costs according to government rules.
- Adherence to any testing, inspection, or quality assurance requirements, including full cooperation with any government inspector.
- Avoidance of any fraudulent demands for payment of money or the transfer of property, such as presenting a voucher while knowing the goods have not been inspected or accepted.
- Accurate and complete records relating in any way to government contracts, including production records, equipment logs, inspection records, testing records, time cards, and invoices.



Classified, Proprietary, and Source Selection Information

We must follow all security regulations of the U.S. government and any other government with jurisdiction over our operations. These regulations cover such things as plant and office security, data transfer, basic day-to-day actions, and the proper handling of classified information.

If applicable, access to classified information is strictly limited to only those individuals with appropriate government security clearance and a valid need to know and must be handled and stored according to strict standards and procedures. We must report actual or potential security violations immediately to our location's Facility Security Officer, Olin's Ethics & Compliance Office, or Olin's Law Department.

U.S. government laws and regulations also prohibit us from soliciting or obtaining third party "proprietary" information such as cost or pricing data, as well as "source selection" information, such as bids, technical evaluation plans, and other sensitive information and documents. If we believe that classified, proprietary, or source selection information has been acquired, we must immediately report the situation to our manager or Olin's Law Department.

Performing All Contract Requirements

When Olin accepts government contracts and subcontracts, we have an obligation to ensure that we administer those contracts appropriately and legally. This means that if we have responsibilities related to any government contracts, we are each responsible for knowing and complying with the exact requirements of the contract at all times. Deviating from a contract's specifications without authorization, improperly substituting products or components, or neglecting to perform required tests and inspections are all prohibited.

It is also important that we provide only accurate, complete, and honest information to our government customers – and all customers, for that matter. This requires that we properly record and categorize all costs and carefully review all documentation to ensure its accuracy before submission.

Questions & Answers

- Q** Our government contract requires that we purchase a product component from a specific supplier. Recently, an Olin purchasing manager found a cheaper source of the component. Can Olin switch suppliers?
- A** No. Olin must purchase raw materials and product components exactly as specified in the contract. A change of any specification, including the source of supply, without the government's prior approval, will likely be regarded as a violation of legal and contractual provisions and, potentially, as the basis for a false claim. This is true even if the new component is of higher quality or costs less.



Reporting and Other Requirements

Because of the importance and potential legal ramifications associated with government contracting, we are required to internally report any known or suspected contract violation any time that we have credible evidence that we have violated a law or been overpaid – whether deliberately or as an honest mistake. In these situations, we must raise the issue with our manager and Olin's Law Department and promptly disclose the situation exactly as the regulations specify.

Cooperating Fully With Government Inspections and Investigations

We cooperate with government inspections and are courteous to inspectors. We must notify the Law Department immediately if we learn about any inspections, investigations, or requests for information from any outside organization.

During an inspection, we must never destroy or alter any documents, lie to or mislead an inspector, or obstruct the collection of information. The Law Department will assist in reviewing any information requested by an inspector before it is released.

Hiring Former Government Employees

Certain laws and regulations may restrict Olin’s ability to hire recent government employees involved in awarding or administration of Olin contracts. We should contact the Human Resources Department before we have any formal or informal discussions with current or former government employees about the possibility of working for Olin. If you have questions about this hiring policy, contact Human Resources or the Ethics & Compliance Office.



Political Contributions and Activities

Olin respects the value of the political process, but our political activities must be limited to our personal time and resources.

Olin will not make any contributions to political parties, candidates, or public officials, except as permitted by law. Contributions made by individual employees, agents, or other representatives will not be reimbursed directly or indirectly by Olin, even when made in Olin’s name. However, Olin does have a Political Action Committee (PAC) to which some U.S. employees may contribute. The PAC can legally make campaign contributions to political candidates and organizations in the United States. All employee contributions to the PAC are completely voluntary.

With the exception of the PAC, we should not use company time or resources for political activities. This prohibition includes using telephones, email, faxes, and photocopying machines, as well as soliciting contributions. As a way of showing respect for others, we should not pressure our fellow employees or suppliers to make a political contribution, volunteer for a political activity, or attend a political event.

Questions & Answers

- Q** Brent’s sister is running for a seat on their local school board. Brent knows that many of his co-workers have school-age children, and he thinks that they will be very interested in his sister’s ideas. He wants to send an informative email to his department to let everyone know about his sister’s candidacy. Should he do this?
- A** **No. Brent should not send the email. Although Olin encourages us to get involved in political activities, Brent should not use company time or email to further his sister’s cause. It could incorrectly suggest that her candidacy has Olin’s support.**

Special Concerns When Dealing With Public Officials

It is unlawful for Olin or its employees and third parties to offer or give anything of value to a public official for the purpose of influencing the official to misuse his or her position in a way that benefits Olin.

Various laws exist around the world restricting gifts and entertainment to public officials, with the restrictions in some jurisdictions more stringent than others. For example, in the United States, the federal government and some state or local government procurement laws prohibit the offer of anything of value to a government employee other than business-related meals or refreshments that are served to participants in a meeting at which government employees may contribute to a fair share of the expense. Therefore, keep in mind that gifts, hospitality, entertainment, and travel expenses provided to officials and employees of the municipalities, states, and federal governments of the United States and other countries, are highly regulated and often prohibited. For this reason, we should not provide any gifts or entertainment, regardless of value, to any government employee or official unless we know that such gifts or entertainment are specifically permissible under Olin's policies, procedures, and any applicable laws and regulations. Please note that if a company is state-owned (meaning, the government owns 10% or more of the company, or controls the business), then gifts or entertainment related to any employee of that company would fall under this rule, and such individuals should be treated as a government employee.

The local laws that apply to national, state, territory, province, canton, local, or municipal government employees vary in different jurisdictions, with some having stricter rules than those of the U.S. federal government. Where allowed by law, gifts, hospitality, entertainment, and travel offered or provided to public officials must be reasonable expenses that relate to the promotion, demonstration, or explanation of Olin's products or to Olin's execution or performance of a contract. Please review Olin's policies regarding anti-corruption, gifts, entertainment, hospitality, and travel, as well as those regarding the company's travel and entertainment and small procurement controls. Before offering any gifts, hospitality, entertainment, or travel to any government employee, seek and maintain written approval from the Ethics & Compliance Office. Such approvals may be granted on a case-by-case basis or in a general approval. The written approval must specify the type of action approved and any related cost limitations, and we need to go back to Ethics & Compliance if the details of our gifts, entertainment, hospitality, or travel change.

Questions & Answers

- Q** Mark works on a Winchester contract with the U.S. government. He knows he cannot buy his customer a meal at a restaurant, but is unsure if he can entertain him in his home. What should Mark do?
- A** Mark should not entertain the government employee in his home. U.S. government contracting rules and Olin's policy prohibit giving meals, gifts, or anything else of value to U.S. government officials except for minor refreshments at business discussions. Gifts and entertainment offered to government officials at the state and local level are also highly regulated. We must never provide gifts or entertainment to a government official unless we know that they are specifically allowed under applicable regulations. Even though Mark will be paying for this with his own money and not seeking reimbursement from Olin, Mark still should not offer to entertain the customer at his home. Contact the Olin Ethics & Compliance Office for additional guidance.

When dealing with any government official, closely review Olin's policies regarding anti-corruption, gifts, entertainment, hospitality, and travel – as well as those regarding the company's travel, entertainment, and small procurement controls.

Reasonable Gifts to Public Officials Subject to General Approvals

In many countries, the Ethics & Compliance Office will grant general approval for promotional gifts of nominal value such as pens, tote bags, caps, etc. to public officials, employees of state-owned enterprises, or others as a courtesy and to promote goodwill. However, such gifts must be small and may never be given to influence any act or decision or to gain an improper advantage. Promotional gifts generally bear our company logo or the logo of one of our brands.

Reasonable gifts may also be given as tokens of esteem or gratitude, but they must be given openly and transparently and properly recorded in the company's books and records. They must also be given only where appropriate under local law, customary where given, and reasonable for the occasion. Offers of gifts to public officials must be approved in advance in writing by Olin's Ethics & Compliance Office and list the details of the type and extent of the gifts to be given.

Hospitality, Entertainment, and Travel Expenses for Public Officials

Hospitality, entertainment, and travel expenses must not be used to influence other people, especially public officials, or to secure business or a business advantage for Olin. As stated above, generally Olin may pay for the reasonable costs of hospitality and travel expenses when these expenses relate to the promotion, demonstration, or explanation of Olin's products or are related to Olin's execution or performance of a contract. However, when such expenses are to be provided for public officials, they must be approved in advance by the Ethics & Compliance Office.

Meals, hospitality, entertainment, and travel in all cases must be reasonable and customary and related to routine business activities, not extravagant, and avoid even the appearance of improper behavior. All forms of adult entertainment are prohibited. Travel expenses for the spouse or family members of a public official will generally be denied, and we must receive specific approval from the Ethics & Compliance Office for such expenses. The Ethics & Compliance Office will not approve any such travel expenses that include any stops or destinations unrelated to the direct promotion and marketing of our products.



Questions & Answers

- Q** Marcus is working with a local public official outside the U.S. to obtain a permit for an Olin facility. In his last visit, the official asked for tickets to an expensive concert in return for "fast-tracking" the permit. His manager said it is customary in this part of the world to make such gifts. Should he offer the tickets?
- A** No. We should not offer the tickets or anything else of value to this public official to obtain a permit or any other business advantage. Not only is this a clear violation of our anti-corruption policy, but it may also be a serious crime punishable by fines and even prison time. We should report this request and our manager's guidance to Olin's Ethics & Compliance Office. We may also report the situation to Olin's confidential Help-Line service.

SECTION 8

Contact Info and Resources



Ethics & Compliance Office

Olin Corporation
190 Carondelet Plaza, Suite 1530
Clayton, MO 63105
United States

Email: Ethics@olin.com

Human Resources

Olin Corporation
190 Carondelet Plaza, Suite 1530
Clayton, MO 63105
United States

Telephone: 1-314-480-1400

Law Department

Olin Corporation
190 Carondelet Plaza, Suite 1530
Clayton, MO 63105
United States

Telephone: 1-314-480-1400

EHS&S and Sustainability

Olin Corporation
3855 North Ocoee Street, Suite 200
Cleveland, TN 37312
United States

Telephone: 1-423-336-4000

Email: EHS@olin.com

Communications

Olin Corporation
190 Carondelet Plaza, Suite 1530
Clayton, MO 63105
United States

Email: CorporateMedia.Queries@olin.com

Investor Relations

Olin Corporation
190 Carondelet Plaza, Suite 1530
Clayton, MO 63105
United States

Telephone: 1-314-719-1755

Email: InvestorRelations@olin.com

Employee Assistance Program

Olin's Employee Assistance Program (EAP) offers confidential, prepaid counseling services to any employee or family member of an employee who needs help with personal problems, including drug and alcohol problems. For program details and a local phone number, contact a Human Resources manager or the Medical Department.

The Olin Help-Line

The Olin Help-Line is a confidential telephone and Internet reporting service available to employees and other stakeholders. Where allowed by local law, individuals may ask questions and raise concerns anonymously. The Help-Line is available 24 hours a day, seven days a week, and translation services are provided.

The Help-Line is available through the following channels:

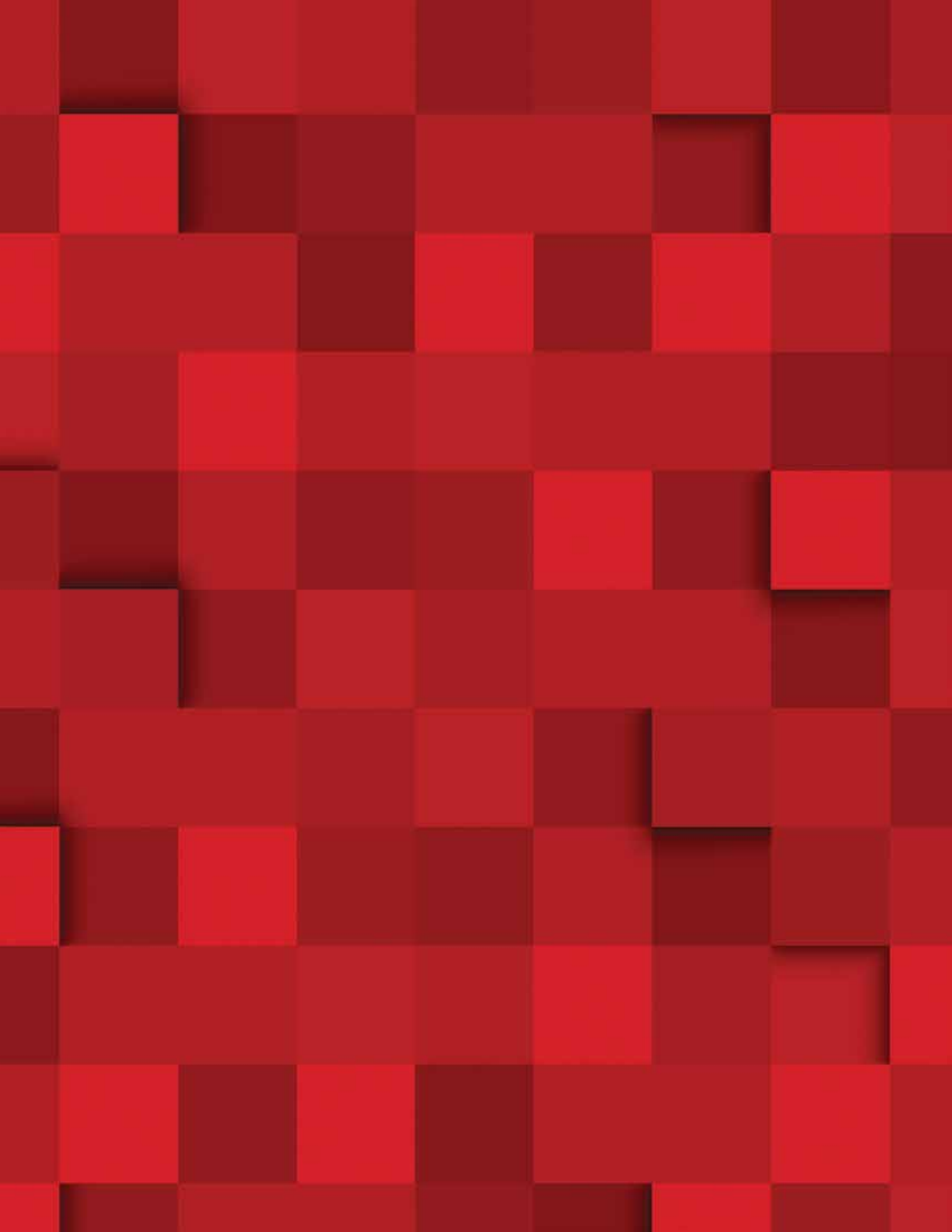
Internet: www.OlinHelp.com

Toll-Free Telephone*:

United States	1-800-362-8348
Australia	1-800-13-5708
Brazil	0800-047-4146
Canada	1-800-362-8348
Chinese Mainland	400-880-1487
Germany	0800-724-3565
Hong Kong	800-93-2266**
Italy	800-902432
Japan	0120-944048
Korea	080-908-0978
Mexico	001-800-658-5454**
The Netherlands	0800-020-1701
Singapore	800-011-1111**
Switzerland	0800-00-0528
Taiwan	00-801-102-880**
Other Countries	1-770-810-1127 (Call the USA Collect)

*Translators are available in most languages

**Dial 800-362-8348 when you hear English





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EVERY DAY. EVERY WAY. EVERY ONE.

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