



## ***Corporate Policy***

**Political Contributions Policy: 6.11**

**Policy Owner:** Dana O'Brien, SVP General Counsel & Secretary

**Reviewed:** June 2022

**Effective:** July 28, 2022

**Supersedes:** Political Contributions Policy Effective December 20, 2018

## **Political Contributions Policy**

This Political Contributions Policy (the "**Policy**") governs Political Contributions (defined below) by Olin Corporation and its global divisions and subsidiaries (collectively "**Olin**").

### **Purpose**

Olin's management believes it is important to stay informed and participate in the political process, when appropriate, to protect the best interests of Olin and its stakeholders. This participation may include using Olin resources to make contributions to political parties, candidates for public office and political organizations, engaging lobbyists or in lobbying activities, and paying membership fees or dues to trade and industry associations and coalitions which may engage in political activity. Olin's Board of Directors has adopted this Policy to ensure that these contributions are made in compliance with applicable law and in a manner consistent with Olin's core values, without regard to the private political preferences of Olin officers or directors.

### **Definitions**

As used in this Policy, "**Political Contributions**" means monetary and non-monetary expenditures that Olin cannot deduct as an "ordinary and necessary" business expense under Section 162(e) of the United States Internal Revenue Code (the "**Code**") in connection with (i) influencing legislation, (ii) participating or intervening in any political campaign on behalf of (or in opposition to) any candidate for public office, and (iii) attempting to influence the general public, or segments thereof, with respect to elections, legislative matters, or referenda, in the United States or any country where Olin does business.

Political Contributions include, in each case to the extent non-deductible, (i) dues, contributions to, or expenditures in support of, or opposition to, political candidates, political parties or political action committees; (ii) direct and indirect payments to external lobbyists; (iii) lobbying related expenditures; and (iv) payments to trade or business associations.

### **Political Contribution Approval**

Each Political Contribution made by Olin, must be approved in advance by Olin's General Counsel and its Chief Executive Officer, other than dues to Trade Association membership in which has previously been so approved. The procedure for obtaining such approval, and the

associated form used for requesting approval, can be found in the Corporate Political Contributions Procedure. The selection and retention of external lobbyists on behalf of Olin and any membership in business and trade associations must be approved in advance by Olin's General Counsel and CEO.

All Political Contributions must be made consistent with the business objectives of Olin, and must comply with this Policy, the Foreign Corrupt Practices Act, the U.K. Anti-Bribery Act and all other applicable laws and regulations.

### **Board of Directors Oversight**

Management reports annually to the Board of Directors of Olin on Olin's government affairs program, including Political Contributions.

### **Disclosure and Reports**

This Policy will be published on Olin's website.

To the extent required by law or other agreement, Olin will publish on its website an annual summary report of Political Contributions.

### **Olin Corporation Good Government Fund**

The Olin Corporation Good Government Fund (OGGF) is a voluntary, nonprofit, non-partisan, unincorporated political action committee. The OGGF is governed by a board of directors and managed in accordance with its internal bylaws and in compliance with all applicable laws. The OGGF is registered with the United States Federal Election Commission (FEC) and makes all required disclosure reports, which are publicly available on the FEC's website.

### **Amendments to the Policy**

Any material amendments to the Policy must be approved by the Board of Directors.