

DISCLOSURE STATEMENT FOR THE CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010 AND THE UK MODERN SLAVERY ACT 2015

BLUE WATER ALLIANCE BUSINESSES

Blue Water Alliance LLP (“BWA” or “Blue Water Alliance”) is a UK Limited Partnership, having its principal offices in Houston, Texas. BWA was founded to foster efficiency, sustainability, and excellence in the global shipping and management of caustic soda and EDC. BWA is a joint venture between Olin Corporation and Mitsui & Co., Inc. and is an independent global trader of ECU-based derivatives, focused on globally traded caustic soda, ethylene dichloride (EDC) and potassium hydroxide (KOH). BWA’s Board of Directors is responsible for reviewing and approving BWA’s Human Rights Policy as laid out in BWA’s Code of Conduct, discussed below, and BWA’s Board of Directors is responsible for reviewing and approving this statement by Board resolution.

SUPPLY CHAIN

As an independent global trader of caustic soda, EDC and KOH, there may be several intermediaries between BWA and its suppliers, as well as several intermediaries between BWA and the ultimate downstream customers.

POLICY STANDARD

BWA’s commitment to maintaining a responsible supply chain is embedded in BWA’s Code of Conduct. The Code of Conduct states that as part of its commitment to good business practices worldwide, BWA will uphold individual human rights in all of its operations. BWA’s Code of Conduct also states that BWA conducts all of our operations in compliance with all applicable laws and requirements and in a manner that protects the health and safety of our employees and everyone in the communities where we operate and where we dispose of waste materials. It is BWA’s value that all peoples be respected. The Code of Conduct expressly states BWA has a zero-tolerance policy for the use of forced labor and human trafficking.

VERIFICATION

BWA screens all of its business partners as part of its SAP system. In order to verify compliance with laws, BWA takes a risk-based approach. BWA conducts due diligence on certain business partners, including a number of suppliers and distributors, based on their geographic location and scope of work for BWA. BWA relies on an Ethics and Compliance group to oversee this due diligence process. At no time in the past year has BWA had any reason to suspect the existence of exploitative practices (modern slavery, child labor, or trafficking) in any of BWA’s businesses. Consequently, BWA believes the risk of such practices by any of its business partners is very low, and BWA has not taken nor does BWA at this time propose to take any specific action to investigate its business partners in this regard

beyond its normal third party due diligence and supplier approval processes. If BWA's experience or perception of the extent of that risk changes then this position will be revisited.

AUDITS

When BWA's risk assessment process identifies the risk of forced labor or human trafficking by existing or prospective business partners, BWA personnel may undertake additional verification efforts using all appropriate resources, including performing audits.

CERTIFICATION

BWA requires all of its high-risk business partners to certify in writing that they comply with BWA's Code of Conduct or Business Partner Code.

BWA'S CODE OF CONDUCT

BWA employees who violate BWA's Code of Conduct are subject to disciplinary action, up to termination of employment. BWA's business partners who fail to uphold the standards set out in the BWA Business Partner Code may have their commercial agreements with BWA terminated.

BWA encourages the reporting of concerns and the protection of whistleblowers through a confidential reporting system - the [BWA Help-Line](#). At BWA's offices in Houston and on its external website, BWA has publicized this disclosure statement along with its policy prohibiting forced labor and human trafficking. BWA relies on an Ethics and Compliance group to manage investigations of all reports to the BWA Help-Line.

TRAINING

BWA conducts regular training on its Code of Conduct, including in-person workshops and online computer training. Through these forums and on an annual basis, employees must acknowledge compliance with the Code of Conduct. BWA's Five Key Principles are highlighted in BWA's annual Code of Conduct training, which includes BWA's respect for the rights, cultures, nationalities, and races of all people with whom BWA interacts. Live workshop training specifically covering BWA's zero tolerance of forced labor and human trafficking has been conducted for certain, targeted BWA personnel, including many of BWA's supply chain personnel.