



TITLE: Conflict Minerals Policy			
TYPE: Corporate Policy			
APPROVER: Policy Committee			
SPONSOR: Chief Legal Officer			
HISTORY	EFF. DATE 11/29/2012	REV. No. 2	REV. DATE 12/4/2023

1. Purpose

LyondellBasell Industries, N.V. and its subsidiaries or affiliates over which it has operational control (“LyondellBasell” or the “Company”) and its officers, directors, and employees (collectively “Employees”) are committed to sourcing responsibly. In particular, LyondellBasell does not knowingly purchase raw materials containing the minerals cassiterite, columbite-tantalite, gold, tantalum, tin, tungsten, or wolframite that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (“DRC”) and adjoining countries. Such minerals are defined as “Conflict Minerals”. The DRC and adjoining countries are defined as the DRC Countries.¹

2. Applicability

This Policy applies to all persons and entities acting for or on behalf of LyondellBasell, including but not limited to its Employees.

3. Compliance with Conflict Minerals Laws and Regulations

- 3.1. LyondellBasell shall comply with applicable laws and regulations related to Conflict Minerals.
- 3.2. On an annual basis, the Procurement Department will determine if the minerals identified above in section 1 are necessary to the functionality or production of products manufactured, or contracted to be manufactured, by LyondellBasell.
- 3.3. If so, the Procurement Department shall conduct a reasonable country of origin inquiry, performed in good faith and reasonably designed to determine whether any such minerals originated in the DRC Countries or are from scrap or recycled sources. Due diligence in this regard includes determining which of LyondellBasell products are in-scope or potentially in-scope for our compliance with Conflict Minerals laws and regulations by identifying product categories that may contain Conflict Minerals through product specifications and by conducting a survey of our direct suppliers. The reasonable country of origin inquiry and due diligence processes will be substantially based on the Organisation for Economic Co-operation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (Second Edition 2013).

¹ The DRC Countries are presently Angola, Burundi, Central African Republic, DRC, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

- 3.4. If the inquiry in section 3.3 determines either of the following to be true:
 - 3.4.1. the Company *knows* that the minerals *did not* originate in the DRC Countries or *are* from scrap or recycled sources; or
 - 3.4.2. the Company *has no reason to believe* that the minerals *may have* originated in the DRC Countries or *may not be* from scrap or recycled sources;
 - 3.4.3. then the Company must disclose its determination; provide a brief description of the inquiry it undertook and the results of the inquiry on its Form SD;
 - 3.4.4. the Company must also make its description publicly available on its external facing website; and provide that internet address on the Form SD.
- 3.5. If the inquiry in section 3.3 determines both of the following to be true:
 - 3.5.1. the Company *knows* or *has reason to believe* that the minerals *may have* originated in the DRC Countries; and
 - 3.5.2. the Company *knows* or *has reason to believe* that the minerals *may not be* from scrap or recycled sources;
 - 3.5.3. then the Company must undertake due diligence on the source and chain of custody of the minerals; file a "Conflict Minerals Report" as an exhibit to its Form SD; make the report available on its external facing website; and provide that internet address on the Form SD.
- 3.6. The Procurement Department will report its findings from section 3.3 inquiry to the Legal Department to include in the Form SD, and post on the Company's external facing website
- 3.7. The Legal Department will prepare and submit its Form SD as required by the Securities and Exchange Commission under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

4. Third Party Requests

Requests from LyondellBasell's customers or other third-parties for certifications or representations as to whether the Company's products contain Conflict Minerals sourced from the DRC Countries will be directed to the Compliance Department.

5. Violations

Violations of this policy may result in disciplinary action up to and including termination from employment.