DATA PROTECTION & PRIVACY NOTICE

The data privacy regulations of some countries require that a person making a report containing personal data must be notified of certain collection and retention practices regarding the information submitted by that person, and in some cases must consent to processing of that personal data. In this notice, ‘personal data’ refers to information related to an individual who is directly or indirectly identified or identifiable, and includes sensitive personal data, where applicable.

You are being asked to read this notice, and depending on where you are located, to acknowledge this notice or consent to processing of your personal data. If you do not wish to acknowledge this notice or give consent to processing of your personal data, we are unable to accept any information through this system and suggest you report directly to your supervisor or manager or to a representative of the Human Resources, Legal or Corporate Compliance Departments, depending on the nature of your report.

1. General

This service is a web and phone-based intake system provided by Huntsman International LLC, 10003 Woodloch Forest Dr., The Woodlands, TX 77380, as data controller, to its employees, vendors, suppliers and business partners and those of its subsidiaries (“reporters”) for reporting matters, which may include possible violations of laws or regulations, our Business Conduct Guidelines or company policies; the types of matters you may report using this service will depend on applicable law. In certain countries, such as the United States, this service may also be used to report suspected violations of other matters.

This service and the database in which the personal data and information that you may report is stored are operated by NAVEX Global, Inc. (“NAVEX”) in the United States.

You may contact Huntsman with any questions relating to this Notice or this service as follows:

R. Wade Rogers,
Sr. Vice President, Global HR
10003 Woodloch Forest Drive,
The Woodlands, Texas 77380, USA
+1 281-719-6000 main telephone number
Privacy@huntsman.com

2. Use of this service

Use of this service is entirely voluntary. You are encouraged to report possible violations directly to your supervisor or manager, or to a representative of the Human Resources, Legal or Corporate Compliance Departments, depending on the nature of the possible violation. If you feel that you are unable to do so, you may use this service to make your report.

This service is a confidential online reporting system that allows you to report possible violations to Huntsman. In certain countries, Huntsman may only accept reports through this service on
limited topics, generally restricted to possible financial, accounting, auditing, bribery, competition law, discrimination and harassment and environment, health, hygiene, and safety matters. If your concern pertains to a matter that, under applicable law, may not be accepted by Huntsman through this service, you will need to contact your supervisor or local management or a representative of the Human Resources, Legal or Corporate Compliance Departments to report the matter.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from Huntsman for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Knowingly providing false or misleading information will not be tolerated. The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for us to follow up with questions we may have.

3. What personal data and information is collected and processed?

This service captures the following personal data and information that you provide when you make a report: (i) your name and contact details (unless you report anonymously) and whether you are employed by Huntsman; (ii) the name and other personal data of the persons you name in your report if you provide such information (i.e.: description of functions and contact details); and (iii) a description of the possible violation as well as a description of the relevant circumstances. Note that depending upon the laws of the country in which you are residing, the report may not be made anonymously; however, your personal information will be treated confidentially and will only be disclosed as set out below.

4. How will the personal data and information be processed after your report and who may access personal data and information?

The personal data and information you provide will be stored in a database which is located on servers hosted and operated by NAVEX in the United States. NAVEX has entered into contractual commitments with Huntsman to secure the information you provide in accordance with applicable law. NAVEX is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.

For the purpose of processing and investigating your report and subject to the provisions of applicable law, the personal data and information you provide may be accessed, processed and used by the relevant personnel of Huntsman, including its subsidiaries and affiliates, including Human Resources, Finance, Internal Audit, Legal, Corporate Compliance, management, external advisors (e.g. legal advisors), or, in limited circumstances, by technical staff at NAVEX. Those individuals may be located in the United States or elsewhere.

Personal data and information you provide may also be disclosed to the police and/or other relevant enforcement or regulatory authorities in any applicable jurisdiction in order to comply with a legal or regulatory obligation to which we are subject. The relevant bodies that receive and process personal data can be located in the US or in another country that may not provide the level of data protection available in the country where you are located. Personal data will be disclosed with your consent where required by applicable law.
5. Retention of personal data
The personal data you provide will be kept as long as necessary to process your report, or, if applicable, as long as necessary to initiate sanctions or to meet our legal or financial needs.

6. Lawful grounds for processing reports
Whenever Huntsman or NAVEX processes personal data in connection with a report, it is on the basis of a lawful "justification" (or lawful ground) for processing, or with your consent where required to do so under applicable law.

In the majority of cases, the processing of personal data in reports will be justified (where applicable data protection laws require lawful grounds for processing of personal data) because it is in Huntsman's legitimate interests as a business and employer to ensure that all employees are complying with the law and the ethical and moral values and standards embodied in our Business Conduct Guidelines. Consent for such processing is not required or applicable for individuals employed in the United States or the European Economic Area (EEA).

In some cases, the processing of personal data in reports is necessary to comply with a legal obligation in a particular jurisdiction. For example, some countries' laws mandate the operation of a whistleblowing system to report suspected acts of corruption.

Huntsman may also process personal data for the purposes of establishing, exercising and defending potential legal claims in the event of a legal proceeding (in any jurisdiction) relating to matters contained in a report, or a dispute or controversy between you and Huntsman, or between Huntsman and a third party.

Where required by applicable law, Huntsman will obtain your consent before using your personal data for purposes other than those stated in this notice.

7. Sources of personal data
Most personal data processed in connection with reports will have been provided by the person submitting the report, and by other persons in the course of follow-up investigations or verifications. This may include information received from a supervisor, from Human Resources, or from other colleagues. Personal data may also be provided by third parties, for example customers, business partners or regulatory bodies, or collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, Closed Circuit television, telephone logs and recordings and email and Internet access logs), if and to the extent permitted by applicable law.

8. Transfer of personal data
We may transfer (with your consent, where required by applicable law) personal data in connection with a report for the purposes identified in this notice outside the country where you work to the United States or another country that may not be considered to have in place equivalent data protection laws to those of the country in which you reside or work. Transfers to the United States will be made on the basis of European Commission-approved Standard Contractual Clauses and/or our EU and Swiss Privacy Shield certifications. Where other applicable data protection laws apply, we will transfer personal data to the United States where we are satisfied that adequate levels of protection are in place to protect the integrity and security of your personal data or adequate security measures are adopted and in compliance with applicable privacy and data protection laws.
Transfers to NAVEX are made pursuant to legally acceptable mechanisms that ensure an adequate level of protection. Where applicable, you may be entitled (depending on applicable data protection laws), upon request to the Huntsman Privacy Contact, to receive a copy of the contract including the appropriate safeguards (for example, Standard Contractual Clauses) that have been taken to protect your personal data during such transfer.

9. Notification to persons named in a report

Subject to applicable law, Huntsman will promptly notify any person who is the subject of a report to this service except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information.

10. Your Rights

Depending on applicable law, you may have the following rights under certain circumstances:

**Right to correction** - Huntsman will take steps in accordance with applicable legislation to ensure that all personal data related to reports is accurate and complete. You are entitled to have any inadequate, incomplete or incorrect personal data corrected (that is, rectified).

**Right to access** - You also have the right to request access to your personal data as well as additional information about the processing.

**Right to erasure** - You may be entitled to have your personal data erased under specific circumstances.

**Right to restriction of processing** - You may have the right to restrict our processing of your personal data (that is, allow only its storage) in certain circumstances.

**Right to object to processing (including profiling) based on legitimate interest grounds** - Where we are relying upon legitimate interests to process personal data, you may have the right to object to that processing. If you object, we must stop that processing unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or we need to process the personal data for the establishment, exercise or defense of legal claims. Where we rely upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

**Right to withdraw consent to processing** - Where we are relying upon consent to process personal data, you have the right to withdraw your consent to processing of your personal data at any time.

You may also have the right to lodge a complaint with us and/or the relevant supervisory authority.

Please contact the Huntsman Privacy Contact if you wish to exercise any of your rights, or if you have any enquiries or complaints regarding the processing of your personal data.