



Lubrizol's Code of Ethics

A Message for our Customers

At Lubrizol, we strive to do the right things the right way. We believe that acting with honesty and integrity is critical to our long-term success. This philosophy was first articulated over 80 years ago by the founders of Lubrizol and is as important to us today as it was then.

Our commitment to ethical and legal conduct is fundamental to our relationships with customers. By acting with honesty and integrity, we believe that we can provide superior products and outstanding service to our customers.

The full text of our Code of Ethics is available on our website at www.lubrizol.com. A link to the Code is located in the bottom right hand corner of the home page. While we encourage you to review the Code in its entirety, below is a summary of several key areas related to our commitment to honesty and integrity.

- **An Inclusive and Respectful Workplace** – Lubrizol insists on a work environment where every person is treated with dignity and respect. Lubrizol believes that much of its success is due to embracing a diverse and inclusive workforce and embraces practices that advance equal opportunity for qualified individuals.
- **Human Rights and Transparency in the Supply Chain** - Lubrizol supports fundamental human rights for all people and only employs individuals who apply to work willingly and are legally of age to perform the work. Lubrizol does not tolerate child labor, human trafficking, slavery or other forced labor at its facilities or in its supply chain.
- **Safety** – Safety is a core value at Lubrizol. Lubrizol is committed to protecting its employees, customers and the communities in which it operates. Employees are responsible for using safe work practices at all times and for immediately reporting any unsafe act, condition or practice.
- **The Environment and Sustainability** – Lubrizol is committed to the highest environmental standards. Lubrizol conducts its business in accordance with the guiding principles of Responsible Care® and strives to minimize waste and the impact of its operations on the environment. Just as Lubrizol helps to make customers' products better, Lubrizol strives to create a better, more sustainable world for everyone.
- **Only Appropriate Gifts and Entertainment** – Under the Code of Ethics, no gift may be offered or accepted unless it (1) is consistent with customary business practices; (2) is not excessive in value; (3) cannot be construed as a bribe or kickback; (4) is not cash or a cash equivalent; and (5) does not violate any laws or regulations. Entertainment must have a legitimate business purpose and be reasonable and appropriate for the occasion.

- **No Bribes/Kickbacks** – Lubrizol prohibits its employees and anyone acting on its behalf (such as agents, consultants and contractors) from offering or receiving any form of bribe or kickback. The prohibition against bribery applies whether the other party is a government official or private party. Facilitation payments are prohibited.
- **Financial Transactions** – At Lubrizol, all transactions must be accurately recorded in its books and records. All purchase orders and invoices must be in writing with sufficient and accurate descriptions of all goods, services and applicable charges. If Lubrizol is reimbursing expenses incurred by a third party, the invoice must be accompanied by detailed receipts or other written evidence of the expenses.
- **Compliance with Laws** – Lubrizol is committed to complying with laws applicable to its business activities around the world including the anti-corruption laws and the competition laws. As a United States corporation, Lubrizol complies with U.S. trade regulations and laws relating to conflict minerals.

Please do not hesitate to contact me should you have any questions or concerns related to this letter. Questions or concerns also may be submitted to Navex Global, an independent firm that provides hotline reporting services to Lubrizol. Contact information for Navex Global can be found at www.lubrizol.com, by using the Code of Ethics link.

Yours sincerely,



Kristin M. Marquardt
Director, Ethics and Compliance

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