



GENERAL NOTICE

January 2020

Equal Employment Opportunity & Affirmative Action Policy

Olin Corporation is committed to ensuring accessibility of this policy to all applicants and employees. If you need assistance accessing or understanding this policy statement or know of an applicant or employee who may need assistance, please contact Valerie Peters, Vice President, Human Resources at (314) 480-1478.

Olin Corporation ("Olin") is committed to equal employment opportunity and maintaining a work environment free of any form of discrimination or harassment against applicants for employment, employees, vendors, contractors, or customers on the basis of race, color, creed, religion, age, sex, gender, sexual orientation, gender identity, national origin, citizenship status, disability, veteran status, marital status, or any other basis protected by law. Olin is a federal contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("Section 4212") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). As such, it is Olin's policy to take affirmative action to employ and advance in employment qualified minorities, women, protected veterans (disabled veterans, recently separated veterans, Armed Forces Service Medal veterans, or active duty wartime or campaign badge veterans) and individuals with disabilities at all levels of employment, including the executive level. Olin will also provide reasonable accommodation to known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose undue hardship on the operation of Olin's business.

Olin will recruit, hire, train and promote individuals in all job titles, and will ensure that all other personnel actions are administered without regard to an individual's race, color, creed, religion, age, sex, gender, sexual orientation, gender identity, national origin, citizenship status, disability, veteran status, marital status, or any other basis protected by law. All employment decisions will be based only on valid job requirements. This extends to all terms, conditions and privileges of employment at all levels including, but not limited to, recruitment, selection, compensation, benefits, training, promotion, and disciplinary actions.

Olin is also committed to ensuring a professional and safe working environment for all Olin people. Workplace harassment of any kind, based on, or because of, an individual's race (color) or ethnicity (national origin, ancestry), gender (gender identity and expression), religion or creed, disability (mental and physical), age, sexual orientation, marital/domestic partner status, medical condition, genetic information, military and veteran status, or any other reason prohibited by law will not be tolerated, whether committed by Olin personnel or by clients, customers, vendors, or other individuals doing business with Olin. Prohibited harassment occurs when a supervisor, co-worker, or even a non-employee behaves or acts in such a way that creates a hostile work environment for another employee based on an individual's race (color) or

ethnicity (national origin, ancestry), gender (gender identity and expression), religion or creed, disability (mental and physical), age, sexual orientation, marital/domestic partner status, medical condition, genetic information, military and veteran status, or other protected characteristic.

Olin encourages anyone who becomes aware of discrimination or harassment to report it immediately to the individual listed below, Human Resources, a manager or a supervisor. We will promptly and thoroughly investigate the alleged misconduct and, if a violation of this policy is found, will take immediate and appropriate corrective action.

Additionally, employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities: (1) filing a complaint; (2) assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of any Federal, State or local law requiring equal opportunity for protected veterans or individuals with disabilities; (3) opposing any act or practice made unlawful by Section 4212, Section 503, their implementing regulations, or any other Federal, State or local law requiring equal opportunity for protected veterans or individuals with disabilities; or (4) exercising any other right protected by Section 4212, Section 503, or their implementing regulations.

Olin's equal opportunity and affirmative action policies also prohibit any and all forms of retaliation against anyone who in good faith complains that these policies are not being followed, or who otherwise participates in a company or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint. If you believe that you have been subjected to retaliation, your complaint should be directed to the individual identified below. After receiving a complaint involving a violation of the company's equal opportunity or affirmative action policy, the company will investigate and take corrective action, as appropriate. Complaints and investigations will be kept strictly confidential to the maximum extent possible. No one, regardless of position or length of service, is exempt from these policies.

The non-confidential portions of the affirmative action programs for individuals with disabilities and protected veterans shall be available for inspection during normal business hours in the Human Resources Department upon request by any employee or applicant for employment. If you are interested in reviewing these documents, please contact the Human Resources Department.

As Chairman, President & CEO of Olin, I fully support our affirmative action program and am committed to the implementation of the company's equal opportunity and affirmative action policies. I have delegated overall responsibility for these policies to Valerie Peters, Vice President, Human Resources. Each Human Resources Manager corporate-wide is responsible for the implementation, daily administration, and auditing of these policies at his or her location. If you have a complaint you should contact Valerie at (314) 480-1478, your local Human Resources Department, or Olin's 24-hour HelpLine at 800-362-8348.



John E. Fischer
Chairman, President & CEO

FOR DISTRIBUTION TO US EMPLOYEES AND LOCATIONS