



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

OLIN BUSINESSES

Olin Corporation (“Olin”) is a Virginia corporation having its principal offices in Clayton, Missouri. Olin is a leading commodity chemical manufacturer and a producer of ammunition. In 2015, Olin acquired from The Dow Chemical Company (i) certain U.S. Chlor Alkali and Vinyl, (ii) Global Chlorinated Organics, and (iii) Global Epoxy businesses. Together with Olin’s existing Chlor Alkali products and Winchester division, Olin is now positioned as a manufacturer in three business segments: [Chlor Alkali Products and Vinyls](#), [Epoxy](#) and [Winchester](#). Olin conducts global operations, including in North America, Latin America, Europe (and UK), the Middle East and Asia.

SUPPLY CHAIN

As a chemical and ammunition manufacturer, there may be several intermediaries between Olin and its suppliers as well as several intermediaries between Olin and the ultimate downstream customer. Olin also recruits people globally. For employee recruitment outside of the United States, Olin works with local employment agencies, primarily located in Germany, the Netherlands and Switzerland.

POLICY STANDARD

Olin’s commitment to maintaining a responsible supply chain is enshrined in Olin’s [Code of Conduct](#) and its Business Partners Code. The Code of Conduct states that as part of its commitment to good business practices worldwide, Olin will uphold individual human rights in all of its operations. The Code of Conduct expressly states Olin has a zero tolerance policy for the use of forced labor and human trafficking. Moreover, within its supply chain, Olin has adopted a Business Partner Code setting forth Olin’s expectation that its suppliers, distributors and other business partners will uphold all applicable laws and regulations, including those prohibiting the use of forced labor and human trafficking. Furthermore, as a US Government contractor, Olin has a Winchester division specific policy further emphasizing that its employees may not engage in human trafficking or use forced labor in the performance of any U.S. government contracts.

Verification

In order to verify compliance with laws, Olin takes a risk-based approach. Olin conducts due diligence on certain business partners, including a number of suppliers and distributors, based on their geographic location and scope of work for Olin. Olin’s Ethics and Compliance group oversees this due diligence process. At no time in the past year have we had any reason to suspect the existence of exploitative practices (slavery, child labor, or trafficking) in any of Olin’s businesses. Consequently, we believe our providers to be very low risks as far as issues with trafficking and modern slavery are concerned, and we have not taken nor do we at this stage propose to take any specific action in relation to these supplier relationships beyond our normal supplier approval processes. If our experience or perception of the extent of that risk changes then this position will be revisited.

AUDITS

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

CERTIFICATION

Olin requires all of its high-risk business partners to certify in writing that they comply with Olin's Code of Conduct or Business Partner Code. When applicable, Olin's Model Contractor Certification requires certain contractors and subcontractors to certify that they are in compliance with all applicable laws and regulations, including those that deal with (a) combatting trafficking in persons (Federal Acquisition Regulation 52.222-50), and (b) non-engagement in prohibited activities, including human trafficking.

OLIN'S CODE OF CONDUCT

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

Olin encourages the reporting of concerns and the protection of whistle blowers through a confidential reporting system - the [Olin Help-Line](#). At many Olin locations, on its internal intranet sites and its external website, Olin has publicized this disclosure statement along with its policy prohibiting forced labor and human trafficking. Where appropriate, in accordance with the Federal Acquisition Regulations, Olin has also posted information about the U.S. government's Global Human Trafficking Hotline. Olin's Ethics and Compliance group investigate all reports to the Olin Help-Line.

TRAINING

Olin 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. Live workshop training has been conducted for certain, targeted Olin personnel specifically about Olin's zero tolerance of forced labor and human trafficking, including some of Olin's supply chain personnel.