



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, operating under three business units, including [Olin Chlor Alkali Products and Vinyls](#), [Olin Epoxy](#), and [Winchester](#). Collectively, these business segments have approximately 6,400 employees in more than 20 countries and customers in nearly 100 countries across the globe.

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 customers. Olin recruits globally, using local employment agencies primarily located in Germany, the Netherlands and Switzerland for employee recruitment outside of the United States.

POLICY STANDARD

Olin’s commitment to maintaining a responsible supply chain is embedded 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. Olin conducts periodic risk assessments, which have included employee survey questions about observing human trafficking. At no time in the past year has Olin had any reason to suspect the existence of exploitative practices (modern slavery, child labor, or trafficking) in any of Olin’s businesses. Consequently, Olin believes the risk of such practices by any of its business partners is very low, and Olin has not taken nor does Olin at this time propose to take any specific action to investigate its business partners in this regard beyond its normal third party due diligence and supplier approval processes. If Olin’s 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 whistleblowers 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 investigates 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 specifically covering Olin's zero tolerance of forced labor and human trafficking has been conducted for certain, targeted Olin personnel, including many of Olin's supply chain personnel.