



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

OLIN'S BUSINESS AND SUPPLY CHAIN

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 8,000 employees in more than 20 countries, with the majority of our operations, sales, and employees located in the United States. Outside of the United States, our manufacturing facilities are in Brazil, Canada, China, Germany, and Italy.

Olin has thousands of Tier 1 suppliers, predominantly located in the United States. In our chemicals business, our key raw materials include chemical feedstocks and energy sources. The majority of these are sourced from within the United States for use at our largest plants in Freeport, Texas; Plaquemine, Louisiana; St. Gabriel, Louisiana; McIntosh, Alabama; Charleston, Tennessee; and Niagara Falls, New York. Approximately 72% of our electricity is generated from natural gas or hydroelectric sources, and we satisfy our electricity needs through a combination of market power, long-term contracts, and the operation of our own power assets. Salt is another key component. Approximately 74% of our salt requirements are met by internal supply from the United States. Ethylene is primarily supplied for the vinyls business under a long-term supply arrangement whereby we receive ethylene from an integrated producer located in the United States and Germany.

At Winchester, the majority of our Tier 1 suppliers are located in the United States or other countries in North America and Europe. Key inputs include brass, lead, steel, plastic, propellant, explosives, limestone, pitch, sulfur, and calcium stearate. Winchester purchases products such as copper-based strip and ammunition cartridge case cups, and lead from vendors, pursuant to multi-year contracts, based on a conversion charge or premium. Winchester's other primary raw material is propellant, which is purchased predominantly from one of the United States' largest propellant suppliers.

ORGANIZATIONAL POLICIES

Olin's commitment to maintaining a responsible business and supply chain is embedded in its [Code of Conduct](#), [Human Rights Policy](#), and its [Business Partner Code](#).

The Code of Conduct states that, as part of our commitment to good business practices worldwide, Olin will uphold individual human rights in all of its operations. Olin's Code of Conduct also indicates that Olin conducts all of our operations in compliance with all applicable laws and requirements, and in a manner that protects the health and safety of our employees and everyone in the communities where we operate and where we dispose of waste materials. It is a core value at Olin that all people should be respected. The Code of Conduct states that Olin will not tolerate the use of forced labor or human trafficking in its operations or business relationships. Olin employees who violate Olin's Code of Conduct are subject to disciplinary action, up to termination of employment.

Olin's Human Rights Policy, which is informed by the UN Guiding Principles on Business and Human Rights, International Bill of Human Rights, and ILO Declaration on Fundamental Principles and Rights

at Work, sets out our overarching commitment to responsible corporate citizenship and the advancement of human rights. It expressly sets out our commitments in relation to forced labor, child labor, and trafficking, as well as other related labor rights such as freedom of association and collective bargaining, non-discrimination, and health and safety.

In relation to its supply chain specifically, the Business Partner Code sets 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 (a requirement which is mirrored in certain supply contracts). The Business Partner Code also sets out Olin's expectations that business partners will not charge recruitment fees, will allow their workers to leave the premises when they are off duty, maintain possession of their personal documents, and will ensure that workers understand the terms and conditions of employment prior to engagement. Furthermore, as a U.S. 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.

Olin requires certain business partners to certify in writing that they comply with Olin's Code of Conduct and 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) combating trafficking in persons (Federal Acquisition Regulation 52.222-50), and (b) non-engagement in prohibited activities, including human trafficking.

Where we become aware that a business partner fails to uphold the standards set out in the Olin Business Partner Code, we will consider ways to leverage them to address such failure and, if that is not possible, may reassess our commercial relationship.

To raise awareness of our policies relating to modern slavery, Olin has publicized this modern slavery statement, along with related policies, at certain Olin locations, on its internal intranet sites, and its external website. Where appropriate, in accordance with the Federal Acquisition Regulations, Olin has also posted information about the U.S. government's Global Human Trafficking Hotline.

ASSESSING AND MANAGING RISK, INCLUDING THROUGH DUE DILIGENCE

To verify compliance with laws, Olin takes a risk-based approach. This involves compliance due diligence for certain business partners, including several suppliers and distributors, based on their geographic location and scope of work for Olin. In addition, Olin undertakes:

- Daily screening of certain direct suppliers and distributors in the chemical business against human trafficking lists in the SAP S4/Hana system.
- Periodic risk assessments, which have included employee survey questions about observing human trafficking.

In addition, Winchester is certified under the U.S. Customs Trade Partnership Against Terrorism ("CTPAT"). As part of CTPAT compliance, Winchester conducts risk assessments on certain international suppliers, including inquiries about the supplier's forced labor and social compliance policies. As part of the follow-up to these risk assessments, we may request additional information and verification of disclosures. Winchester's general commercial contracts also include clauses to combat the trafficking of persons.

Olin's Ethics and Compliance group oversees this due diligence process.

REPORTING CONCERNS AND MONITORING

Any violation of Olin's Code of Conduct or policies relating to modern slavery can be reported via Olin's confidential reporting system - the [Olin Help-Line](#). All reports to the Olin Help-Line are evaluated, investigated, and addressed by Olin's Ethics and Compliance Office.

At no time in the past year has Olin identified the existence of any actual incident of modern slavery or child labor in any of its businesses or business relationships.

Olin's Board has ultimate oversight of its risk profile and risk management process and is responsible for satisfying itself that the risk management processes are functioning effectively, including Olin's Enterprise Risk Management system, Human Rights Policy, Code of Conduct and related compliance programs, internal control functions, and internal audit.

TRAINING

Olin conducts regular training on its Code of Conduct, including in-person workshops and online computer training. Through these forums, employees must annually acknowledge compliance with the Code of Conduct. Olin specifically highlights its value of People in its annual Code of Conduct training, which emphasizes respect for human rights.

This statement has been approved by the Board of Directors on November 12, 2025.



Ken Lane
President & CEO
Olin Corporation