

OLIN CORPORATION
Political Contributions Policy
Adopted February 20, 2015

This Political Contributions Policy (the “**Policy**”) governs Political Contributions (defined below) by Olin Corporation and its divisions and subsidiaries (collectively “**Olin**”).

Political Contributions

As used in this Policy, “**Political Contributions**” mean monetary and non-monetary expenditures that Olin cannot deduct as an “ordinary and necessary” business expense under Section 162(e) of the Internal Revenue Code (the “**Code**”) in connection with (i) influencing legislation, (ii) participating or intervening in any political campaign on behalf of (or in opposition to) any candidate for public office, and (iii) attempting to influence the general public, or segments thereof, with respect to elections, legislative matters, or referenda, in the United States. Political Contributions include:

- contributions to, or expenditures in support of, or opposition to, political candidates, political parties or political committees;
- dues, contributions or other payments to tax-exempt “social welfare” organizations and “political committees” operating under Sections 501(c)(4) and 527 of the Code, respectively, and to tax-exempt entities that write model legislation and operate under Section 501(c)(3) of the Code;
- corporate contributions to Political Action Committees;
- expenditures associated with lobbyists and lobbying activities which are not deductible under Section 162(e) of the Code (“**Direct Lobbying Expenditures**”);
- the portion of trade association membership fees and dues which are used for an expenditure or contribution that would not be deductible under Section 162(e) of the Code if made directly by Olin (“**Nondeductible Trade Association Dues**”); and
- the portion of payments, other than membership fees and dues, made by Olin to trade associations, including special assessments, donations and other payments which are used for an expenditure or contribution that would not be deductible under Section 162(e) of the Code if made directly by Olin (“**Additional Trade Association Payments**”).

Government Affairs Philosophy

Olin’s management believes that it is important to stay informed and participate in the political process when appropriate to ensure that we protect the best interests of Olin and its shareholders. This participation may include using its resources to make contributions to political parties, candidates for public office and political organizations, engaging lobbyists or in lobbying activities, and paying membership fees or dues to trade and industry associations and coalitions which may engage in political activity. Olin’s Board of Directors has adopted this Policy to ensure that Political Contributions are made in a manner consistent with Olin’s core

values, to protect or enhance shareholder value, without regard to the private political preferences of Olin officers or directors.

Political Contribution Approval

Each Political Contribution made by Olin, other than Trade Association Dues, must be approved in advance by Olin's General Counsel and its Chief Executive Officer. The selection and retention of outside lobbyists on behalf of Olin must be approved by Olin's General Counsel. Membership in business and trade associations must be approved in advance by Olin's General Counsel. Once membership in a business or trade association is approved, the membership fees and dues are paid when invoiced.

All Political Contributions must be made consistent with the business objectives of Olin, and must comply with this Policy, the Foreign Corrupt Practices Act, the U.K. Anti-Bribery Act and all other applicable laws and regulations.

Board of Directors Oversight

Management will report annually to the Board of Directors of Olin regarding Olin's compliance with this Policy, and will provide a report to the Board of Directors summarizing all Political Contributions made during each calendar year within a reasonable time following the close of the calendar year.

Disclosure and Reports

This Policy will be published on Olin's website.

If the total of (i) contributions to, or expenditures in support of, or opposition to, political candidates, political parties or political committees, (ii) dues, contributions or other payments to tax-exempt "social welfare" organizations and "political committees" operating under Sections 501(c)(4) and 527 of the Code, respectively, and to tax-exempt entities that write model legislation and operate under Section 501(c)(3) of the Code, (iii) corporate contributions to Political Action Committees, and (iv) Additional Trade Association Payments, aggregate more than US \$50,000 in a calendar year, Olin will publish on its website an annual summary report of such Political Contributions within a reasonable time following the close of the calendar year, disclosing the name(s) of the recipient(s), the type(s) and amount(s) of the contribution(s).

If Direct Lobbying Expenditures aggregate more than US \$150,000 during a calendar year, Olin will publish on its website within a reasonable time following the close of the calendar year an annual summary report disclosing the amount of Federal, State and Local lobbying expenses.

If Nondeductible Trade Association Dues aggregate more than US \$150,000 during a calendar year, Olin will publish on its website within a reasonable time following the close of the calendar year an annual report disclosing the name(s) of the trade association(s) or similar organization(s) and the amount of the Nondeductible Trade Association Dues paid to each.

Olin Corporation Good Government Fund

The Olin Corporation Good Government Fund (“OGGF”) is a voluntary, nonprofit, non-partisan, unincorporated political action committee. The OGGF is governed by a Board of Directors and managed in accordance with its internal bylaws and in compliance with all applicable laws. The OGGF is registered with the Federal Election Commission (FEC) and makes all required disclosure reports, which are publicly available on the FEC’s website.

Amendments to the Policy

Any amendments to the Policy must be approved by the Board of Directors.