



LSB Industries, Inc. – Contractor and Supplier Code of Conduct

At LSB Industries, Inc. (“LSB”), we have a long history of doing the right thing for our company, customers, suppliers, communities, and employees. We are committed to dealing fairly and honestly with our stakeholders and to abiding by all laws, regulations, and LSB policies that apply to the work we do. This Contractor and Supplier Code of Business Conduct (the “Code”) lays out the standards to which we hold ourselves and our contractors, suppliers and vendors to in our work.

LSB strives to conduct business with suppliers, business partners, contractors, vendors, agents, consultants, and other third parties (collectively, “Third Parties”) who share our commitments to conducting business in full compliance with the letter and spirit of all applicable laws, rules and regulations, in accordance with the highest ethical standards, and in a manner that keeps our employees and communities safe. LSB expects all Third Parties and their respective employees, agents, and subcontractors to follow the principles summarized in this Code.

Third Parties are responsible for understanding and adhering to LSB’s expectations. Third Parties should implement appropriate controls to ensure adherence to this Code. Third Parties should contact their LSB relationship owner or use our Compliance Helpline to request help or guidance or to report conduct that is in conflict with the Code. LSB may terminate its business relationship with a Third Party that acts in a manner inconsistent with the Code.

Note: The Code is not intended to create – and does not create – a contract, any obligations, or any rights; it is neither a contract of employment nor a guarantee of any continued relationship with LSB. Particular supplier contracts may contain more specific provisions addressing some of these same issues. Nothing in this Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Code and any other provision of a particular contract, the other provision will control.

Laws, Rules, and Regulations

We expect all Third Parties to work diligently to conduct their business in full compliance with all applicable laws, rules, and regulations that govern in the jurisdictions in which they do business.

We expect Third Parties to cooperate with government investigations, as required by law. We expect Third Parties to conduct business in compliance with all applicable antitrust laws, import and export regulations, and anti-corruption laws (including but not limited to the Foreign Corrupt Practices Act). We expect Third Parties to comply with all applicable anti-boycott laws and trade sanctions.

Health, Safety, & Security

We expect Third Parties to make workplace health, safety, and security a top priority. Third Parties are expected to provide a safe and healthy work environment and comply with all applicable environmental, health, and safety laws, regulations, and standards. We expect Third Parties to provide appropriate training aimed at helping their respective employees, agents, and contractors perform in the safest manner possible. We expect Third parties to ensure that all employees are aware of potential health and safety risks, appropriately trained on the implementation of control measures, and empowered to identify hazards and stop work.



We expect Third Parties to maintain a formal written program to manage and continuously improve health and safety performance. We expect Third Parties to strive to sustain injury- and incident-free job sites and have procedures and systems in place to manage, track and report occupational incidents, injuries, and illnesses. Third Parties are expected to comply with the LSB Alcohol and Drug Abuse policy while conducting business with or on behalf of LSB.

Environmental Protection

We expect Third Parties to:

- do business and operate their facilities in ways that protect the environment and their communities;
- comply with all applicable environmental laws and regulations, including those relating to hazardous materials;
- promote environmental concerns among their employees and their communities;
- make conserving resources a fundamental requirement of all of their operations;
- Promote environmentally sound manufacturing, transport, use and disposal of your products
- Apply energy-efficient and environmentally friendly processes and technologies;
- Eliminate, reduce, and/or control waste and emissions to air, water, and soil;
- work with regulators to develop appropriate environmental laws and policies; and
- strive to make continuous improvements to their environmental program.

Fair Dealing

We expect Third Parties to conduct all dealings with us, our customers, vendors and other business partners in a fair, ethical, and lawful manner. Third Parties should prohibit taking unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or any other unfair dealing practice.

We expect Third Parties to avoid conflicts of interest or even the appearance of conflicts of interest in their business relations. We expect Third Parties to disclose to LSB any actual or potential conflict of interest in their business dealings with LSB.

Entertainment and Gifts

We expect Third Parties to refrain from, directly or indirectly, offering to pay, paying, or accepting anything of value to influence a decision or business outcome, or gain some other improper advantage.

We expect Third Parties to use good judgment and moderation when exchanging business gifts or entertainment with LSB employees or on behalf of LSB in accordance with LSB policies. Giving or receiving a gift or offer of entertainment is not appropriate if it creates a sense of obligation, puts a party in a situation where they may appear biased, or is done with the intent to influence a business decision. We expect Third Parties to prohibit any offers of cash or cash equivalents in any amount, personal discounts, loans, gifts of more than nominal value, services, employment, pleasure travel, or excessive entertainment.



Public Statements & Political Activity

Third Parties should never speak on behalf of LSB without approval from an authorized LSB spokesperson. Third Parties are prohibited from engaging in political or lobbying activities on behalf of LSB without approval from an appropriate officer of the company.

Accurate Books and Records

We expect Third Parties to maintain absolutely accurate, truthful, and complete financial records related to their business dealings with or on behalf of LSB. As part of this effort, Third Parties are expected to work diligently to prevent and detect fraud and to maintain all records required by applicable laws and LSB policies.

Property and Information

We expect Third Parties to take care when using our corporate assets – including safeguarding them from theft, misappropriation, destruction, or misuse. Third Parties are expected to use such assets only when authorized and in the manner authorized. Third Parties are expected to follow all intellectual property laws and comply with the intellectual property ownership rights of LSB and others.

Third Parties are expected to maintain the confidentiality of all non-public or proprietary information obtained as a result of their business relationship with LSB (including any such information that belongs to another company or business partner). We expect Third Parties to help safeguard and protect the privacy of LSB employee personally identifiable information that they may be given access to as a result of their business dealings with LSB. Third Parties are expected to refrain from trading in the securities of LSB or another company while in possession of material, non-public information or tipping such insider information to anyone else.

Respect, Non-Discrimination, & Culture

We expect Third Parties to make workplace respect, non-discrimination, and culture a top priority. Third Parties are expected to comply with all applicable non-discrimination and labor laws, regulations, and standards. We expect Third Parties to work with LSB to make sure the workplace is free of discrimination and harassment. LSB expects Third Parties to maintain a respectful, inclusive, and productive workplace.

We expect Third Parties to observe fair labor practices and have controls in place that ensure compliance with applicable labor law and regulations, including those related to child labor, fair wages, and working hours. We expect Third Parties to prohibit the use of any form of forced or involuntary labor.

Reporting Concerns

We rely on Third Parties to report suspected misconduct and ask questions when help or guidance is needed. Keep in mind that if you make a report using the helpline, your identity will not be disclosed where applicable law allows, if you wish. The information you provide will be relayed to LSB for further investigation. Please note, however, that it may be more difficult for LSB to thoroughly investigate reports that are made anonymously. For this reason, you are encouraged



to share your identity when making a report. LSB will not tolerate retaliation against any person for making a report or participating in an investigation of possible misconduct in good faith.

Should you suspect any illegal or improper conduct that you think could violate our Contractor and Supplier Code of Conduct, you may report such activity to our third-party confidential reporting service at 1-888-625-0339 or at [this website link](#).