



Avient Corporation  
33587 Walker Road  
Avon Lake, OH 44012

## AVIENT'S POSITION ON HUMAN RIGHTS July 2021

### OUR COMMITMENT

Avient is dedicated to conducting business ethically and with integrity, and our Position on Human Rights is part of our commitment to socially responsible business practices. The Board of Directors has ultimate responsibility for matters related to governance and corporate responsibility, and the Governance and Corporate Responsibility Committee provides oversight and guidance with regard to how the Board and management evaluate and integrate corporate responsibility and sustainability into Avient's business strategy, decision-making and stakeholder communication, including this Position on Human Rights.

**Respecting Human Rights.** Avient respects the dignity of individuals and recognizes that protection of basic human rights is fundamental to the way we manage our business, and we require our suppliers to do the same. We recognize that there are many different organizations that have set forth international human rights principles, such as the Universal Declaration of Human Rights and The International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. These organizations generally promote core principles, including respect and support for identified human rights. These principles are integrated into our core values of Integrity, Honesty and Respect and are reflected in our guidelines for ethical behavior, as outlined in the Avient Code of Conduct and Supplier Code of Conduct.

**Child and Forced Labor.** Avient forbids the use of any form of child labor in connection with Avient's business. We define child labor as services by anyone under the age of 16 and, if local law is more restrictive than our policy, we will comply with the more restrictive local law. Additionally, Avient forbids any form of forced or compulsory labor or human trafficking in connection with Avient's business.

**Freedom of Association and Collective Bargaining.** Avient respects our associates' right to join or not join any lawful organization, including trade unions and works councils, and we are committed to complying with all applicable local and national laws pertaining to freedom of association and collective bargaining.

**Commitment to Fair or Living Wages.** At Avient, our people are at the forefront of all we do. Our goal is to provide fair and competitive compensation and benefits to all of our associates. We strive to maintain a competitive pay program that serves to attract, retain, motivate and reward our associates.

We regularly conduct market analyses to ensure the competitiveness of pay ranges, aligned to our objective to award pay that is commensurate with experience, level of responsibility, and marketability. We offer merit-based programs and general increase programs in support of this objective.

Avient complies with all applicable local laws, including those pertaining to wages, overtime and benefits.

**Discrimination and Harassment.** Avient is committed to an inclusive workplace, and has no tolerance for discrimination or harassment of any kind based on a person's race, religion, sexual orientation, ethnicity or on any other legally protected characteristics.

**Environment, Health and Safety.** Avient considers healthy and safe working conditions, and the prevention of injuries and environmental incidents, critical to the success of our business. It is not unusual for our expectations and enforced standards to exceed legal requirements. Our health and safety policies,



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which apply to all Avient associates, are to safeguard the health and well-being of each person while at work.

These important principles are encompassed within several policies throughout Avient's organization and we are committed to ensure respect for human rights in our operations, and with our suppliers and partners.

We also recognize water as a fundamental human right, and respect the need for safe drinking water and pollution prevention to protect communities and ecosystems.

**Community and Stakeholder Engagement.** Avient recognizes and respects the role we play in the communities in which we operate. We prioritize stakeholder engagement and discussion related to implementation of our human rights policy, particularly as it pertains to employee and environmental safety. Leaders at our global facilities are in contact with local community leadership such as police and fire, labor safety organizations, local affiliates of global environmental regulatory agencies, local officials and/or trade unions and works councils. Regular engagement with these key stakeholders builds positive community relations, sets the expectation for open dialogue related to the effectiveness of our policy implementation, and assists with preparedness and collaboration in the event of an issue in our operations in that community.

Avient takes pride in our role as a responsible corporate citizen, and the importance of collaborative relationships with our many stakeholder groups. We value opportunities to engage with these stakeholders and welcome their feedback and input related to our activities and their interests. We seek to respect the human rights of local potentially-affected peoples and to develop an understanding of the cultures, customs and values that prevail in the local communities in which we operate, including those of often under-represented groups such as indigenous peoples.

## **OUR OWN OPERATIONS**

### *Our Associates*

Our associates are expected to adhere to our Code of Conduct and understand that violations may result in disciplinary action, up to and including termination of employment. To ensure consistent communication and compliance, all associates globally are expected to complete our Code of Conduct training on an annual basis on various aspects of our Code, including but not limited to human rights. Our Code of Conduct is available in over 20 languages and can be found at:

<https://www.avient.com/company/policies-and-governance/code-conduct>

Our Ethics Hotline is available 24 hours a day, 7 days a week, by phone or web, for our associates and the community to report any concerns or make inquiries. Those making reports can remain anonymous.



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### *Our Supply Chain*

At Avient, we commit to comply with laws and regulations supporting human rights such as the California Transparency in Supply Chains Act, the UK Modern Slavery Act, the Dodd-Frank Act requiring disclosures on conflict minerals, and the EU's - Conflict Minerals Regulation. Avient utilizes the OECD Due Diligence Guidance for Responsible Mineral Supply Chains for conflict mineral management. Our disclosures are located at:

<https://www.avient.com/company/policies-and-governance/ca-transparency-act-disclosure>

<https://www.avient.com/company/policies-and-governance/europe-modern-slavery-and-human-trafficking-statement>

We reinforce Our Commitment to human rights, as set forth above, throughout our organization by incorporating and reflecting these principles in organizational policies, training programs, and our governance management framework.

### **OUR SUPPLIERS AND PARTNERS**

Avient is also committed to ensuring our suppliers, agents, and distributors uphold the same standards.

We strive to use supply chain partners whose policies, processes and systems ensure that human rights are respected, and whose trade does not directly or indirectly cause human rights violations globally. Our suppliers and partners understand that our relationship is based on an expectation of compliance with applicable laws and regulations and adherence to internationally recognized environmental, social, corporate governance and management systems standards. We reserve the right to terminate the business relationship if a supplier fails to meet their obligations. Our Supplier Code of Conduct can be found at:

<https://www.avient.com/sites/default/files/2020-10/supplier-code-of-conduct.pdf>

Our Supplier Code of Conduct drives interactions with our suppliers and our expectations for doing business, and generally aligns with International Labor Organization (ILO) standards.