

VENATOR

Human Rights Policy

1. Policy Statement

The Venator Human Rights Policy (“Policy”) reinforces the principles for our actions and behavior in relation to human rights in demonstration of our commitment to developing an organizational culture that supports internationally recognized human rights and seeks to avoid complicity in human rights abuses. These principles are consistent with those contained within the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the United Nations Global Compact, and the ILO Declaration on Fundamental Principles and Rights at Work (also referred to as the “ILO Core Conventions”).

2. Policy Scope

This Policy complements the Company’s Business Conduct Guidelines, which sets out global expectations for our behaviors, actions, and decisions, ensuring satisfaction of our values. The Business Conduct Guidelines represent the highest level of corporate guidance for our associates. The Business Conduct Guidelines promote respect for human rights by providing guidance on maintaining a safe and respectful working environment, offering fair employment, respecting privacy, complying with anti-corruption requirements, encouraging environmental stewardship, and conducting responsible marketing.

All directors, officers, associates, and representatives of Venator companies, which include personnel authorized to act on Venator’s behalf in any of the Company’s operations, including operations conducted by any departments, subsidiaries, agents, consultants, or other representatives, and joint ventures or other business enterprises in which the Company is a participant, (“Venator Personnel”) are required to comply with the Business Conduct Guidelines. Venator expects its suppliers, vendors, and subcontractors to share its commitment to human rights and equal opportunity in the workplace demonstrated by the Business Conduct Guidelines and this Policy.

3. Policy Objectives

- Venator is committed to providing a workplace that does not use forced or child labor; that respects the rights to freedom of association and collective bargaining.
- Venator is committed to providing a workplace that is free from unlawful harassment and discriminatory practice on the basis of race, color, gender, national origin, sexual orientation, age, religion, or disability.
- Venator is committed to compensating associates with competitive wages based on local market assessments and to complying with all laws regarding conditions of employment, including basic and overtime working hours.
- Venator is committed to respecting the cultural values of the communities in which it operates, including the rights of indigenous peoples as defined by applicable international standards.
- Venator is committed to ensuring the provision of security to our operations is consistent with relevant international standards, using security services only where necessary and requiring the use of force only when necessary and proportionate to the threat.
- Venator is committed to promoting its values to its suppliers, vendors and subcontractors and expects them to adhere to these values.
- Venator is committed to being attentive to concerns raised by stakeholders and to working with stakeholders to support human rights within the spheres of Venator’s activity and influence.

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4. Policy Implementation

In order to achieve the Policy objectives, Venator shall undertake the following:

- Support the Policy with guidance and training on compliance with the Policy and reporting of any suspected violations
- Encourage reporting of suspected violations of this Policy through the same channels established for reports made under the Business Conduct Guidelines
- Suspected violations will be investigated by a team established by the Ethics & Compliance Team with appropriate corrective or other actions taken
- Develop and implement procedures to promote consistency of Company practices and to meet regulatory requirements of applicable governing bodies
- Periodically conduct a Policy audit in accordance with the Corporate Compliance Program audit requirements, and when necessary, update the Policy or its procedures and guidance with respect to its effectiveness. Venator may seek an independent audit at any time in any manner as the Nominating and Corporate Governance Committee of the Board of Directors deems appropriate
- At least annually, report the Company's human rights performance to the Board of Directors

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Document Revision History

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