



California Transparency In Supply Chains Act Of 2010 Statement

Venator has established Business Conduct Guidelines ("Guidelines") that apply to all Venator employees ("Associates"). The Guidelines reflect the expectation that all Associates and others, including third parties with whom we do business, will share the values stated in the Guidelines. The Guidelines require Associates to comply with all applicable laws and regulations, including but not limited to those relating to forced labor and human trafficking. All Associates receive training on the Guidelines. Venator also has a Human Rights Policy, which complements the Guidelines, and further demonstrates Venator's commitment to promoting its values to suppliers and expresses an expectation for adherence to these values.

While Venator does not provide specific training on forced labor and human trafficking, the Guidelines and the Human Rights Policy provide that if an Associate needs guidance on an ethical or legal question or has knowledge of a potential violation of the Guidelines, policies, procedures, or the law, he or she shall seek advice from one or more of a list of resources or to report it via a 24 hour ethics help line. The Human Rights Policy further suggests reporting through the same channels, which are open to all Associates and third parties. All reports of alleged violations will be investigated. If the results of an investigation indicate that corrective action is required, Venator will decide the appropriate steps to take, including discipline, up to and include termination of employment or, in the case of a third party, the business relationship.

Venator also has a Vendor Code of Conduct and our suppliers are expected to adhere to that Vendor Code of Conduct. Specific behavioral standards are set out in the Vendor Code of Conduct including that vendors and representatives are expected to share our commitment to human rights. In addition, under our standard form agreements with suppliers, suppliers are expected to represent and warrant that they do not and will not use any forced labor, whether in the form of prison labor, indentured labor or otherwise and provide for audit rights in connection with this. Suppliers failing to meet these terms would be in breach of such agreement. At this time, Venator does not require suppliers to certify that all materials incorporated into Venator products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business, nor do we audit or require third-party verification of supplier's compliance with these behavioral standards.

VENATOR

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