



TITLE: Conflict Minerals Policy			
TYPE: Corporate Policy			
APPROVER: Policy Committee			
SPONSOR: Chief Legal Officer			
HISTORY	EFF. DATE 11/29/2012	REV. No. 0	REV. DATE

1. Purpose

LyondellBasell Industries, N.V., including its subsidiaries or affiliates over which it has operational control (“LyondellBasell” or the “Company”) and its officers, directors, and employees (collectively “Employees”) has determined that it will not manufacture or produce products containing certain minerals mined from the Democratic Republic of Congo (“DRC”) or its adjoining countries¹ (which are referred to as the “DRC Countries”) where proceeds of the mining activities have been used to finance armed militias committing atrocities in those war-torn countries. These “Conflict Minerals” are gold², wolframite, cassiterite, columbite-tantalite, and their derivative metals, which include tin, tungsten, and tantalum.

2. Scope and Applicability

- 2.1 This Policy applies to all persons and entities acting for or on behalf of LyondellBasell, including but not limited to its Employees.
- 2.2 While the Company has established procedures to ensure that it does not manufacture or produce products containing Conflict Minerals from the DRC Countries, it depends upon its Employees to fully comply with its procedures and to report to International Trade Compliance any possible concern related to the introduction of Conflict Minerals sourced from the DRC Countries into our manufacturing processes, supply chain activities, or business operations in any way.
- 2.3 The Finance & Corporate group of the Company’s Legal Department shall prepare and submit LyondellBasell’s annual Conflict Minerals disclosures (Form SD) to the Securities and Exchange Commission (“SEC”) as required under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”).

¹ The countries adjoining the DRC are those that share an internationally recognized border with the DRC. These are presently Angola, Burundi, Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

² LYB’s use of gold is limited to catalysts and is not contained in the end products so it is not considered as “necessary to production and is therefore exempt from Conflict Minerals reporting obligations.

3. Background

3.1 Section 1502 is intended to choke off the minerals trade as a source of funding for armed violence in countries in Central Africa. Section 1502 seeks to accomplish this goal by amending the Securities Exchange Act of 1934 (“Exchange Act”) to require SEC registrants to make annual disclosures if they manufacture products which contain Conflict Minerals. In particular, Section 1502 requires SEC registrants to take the following steps in these annual disclosures:

- 3.1.1 indicate whether Conflict Minerals are “necessary to the functionality or production of products they manufacture” or “contract to manufacture”, and, if so,
- 3.1.2 indicate whether any such necessary Conflict Minerals originated in the DRC Countries, and, if so,
- 3.1.3 provide an audited report on its due diligence to determine whether these Conflict Minerals funded armed groups in a covered country.

3.2 The Company’s first Conflict Minerals disclosure Form SD must be filed on or before May 31, 2014, and will cover the data collected in 2013 with respect to products produced and sold by the Company in 2013. In subsequent years, the annual submittals must also be filed by May 31st of each such year.

4. Conflict Minerals Procedures

4.1 The Company has implemented the following procedures designed to ensure that no Conflict Minerals sourced from the DRC Countries are purchased by LyondellBasell or contained in its products.

4.2 All Employees intending to purchase Conflict Minerals or products containing Conflict Minerals (whether or not sourced from DRC Countries) on behalf of LyondellBasell that may then be incorporated into products sold by LyondellBasell must first identify to the Company’s Finance & Corporate group (a) the types and quantities of Conflict Minerals intended to be purchased, (b) if applicable, a description of the products containing Conflict Minerals intended to be purchased, including the amount of the Conflict Minerals contained therein, (c) a description and the amount of the product sold by the Company that will contain the Conflict Minerals, (d) the name and address of the supplier from whom these Conflict Minerals or products containing Conflict Minerals will be purchased, and (e) the country of origin from which these Conflict Minerals, including the Conflict Minerals contained in any product purchased by the Company were sourced. To satisfy the Reasonable Country of Origin Inquiry (“RCOI”) requirements of Section 1502, the Finance & Corporate group will not, subject to their reasonable discretion, approve the purchase of any Conflict Minerals or products containing Conflict Minerals, without first receiving the following from the supplier:

- 4.2.1 the identity of the smelter that processed the Conflict Minerals,
 - 4.2.2 written certification that the Conflict Minerals did not originate in the DRC Countries or came from recycled or scrap sources, and
 - 4.2.3 documentation that the smelter has received a “conflict-free” designation by a recognized industry group that requires an independent private sector audit of the smelter or the smelter itself has obtained an independent private sector audit that is made publicly available,
- 4.3 Copies of all documentation associated with the Company’s purchase of Conflict Minerals or products containing Conflict Minerals that will then be incorporated into LyondellBasell products shall be provided to Finance & Corporate within thirty (30) days of receipt of said Conflict Minerals.
- 4.4 The Company’s sanctioned country screening functionality within Global Trade Services (“GTS”), the global enterprise system’s denial list screening tool, will be formatted to identify for review any and all purchases sourced from the DRC Countries. International Trade Compliance will apply due diligence as warranted to confirm that none of these purchases include Conflict Minerals.
- 4.5 Requests from LyondellBasell’s customers or other third-parties for certifications or representations as to whether the Company’s products contain Conflict Minerals sourced from the DRC Countries will be directed to this Policy on the LyondellBasell external website.