

GRI CONTENT INDEX

A supplement to the 2020 Sustainability Report,
Progress Through Transformation



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Global Reporting Initiative (GRI) Content Index

Chevron Phillips Chemical's (CPCChem) 2020 Sustainability Report, *Progress through Transformation*, was prepared in accordance with the GRI Standards: Core Option. The GRI Content Index is intended to supplement the information provided throughout the report. This index includes page numbers where disclosed information and data may be located within the report, and/or links to publicly available information if the disclosure is not directly stated. This index also includes contextual information regarding the disclosures, their boundaries and any stated omissions.

General Disclosures

GRI Standard	Disclosure Description	Response/Comments/Omission
GRI 102: General Disclosures 2016		
102-1	Name of the organization	Chevron Phillips Chemical Company LLC
102-2	Activities, brands, products, & services	Products and Solutions
102-3	Location of headquarters	Global Headquarters: The Woodlands, Texas, USA Asia Region Headquarters: Singapore Europe Region Headquarters: Diegem, Belgium Drilling Specialties Company Headquarters: The Woodlands, Texas, USA Performance Pipe Headquarters: Plano, Texas, USA
102-4	Location of operations	Locations
102-5	Ownership and legal form	We are a limited liability company formed in 2000 under Delaware law, and we are owned 50 percent by Chevron U.S.A. Inc. (Chevron), an indirect wholly owned subsidiary of Chevron Corporation, and 50 percent by Phillips 66 Company (P66Co), a wholly owned subsidiary of Phillips 66.
102-6	Markets served	Markets 2020 Sustainability Report - Page 5
102-7	Scale of the organization	Total number of employees: 4,715 as of December 31, 2020 Total number of operations: 30 global manufacturing and research facilities Annual Sales and Other Operating Revenues: \$8,439 MM Total Liabilities: \$4,774 MM; Total Members' Equity: \$12,252 MM Quantity of products from wholly owned assets and the equity share of products from joint venture assets: 52,654 MM Pounds (23,892 kTA)
102-8	Information on employees and other workers	Information on CPCChem employees is provided in the Performance Data Tables of the 2020 Sustainability Report. Percentage of part-time employees is less than one percent. We use the services of contractors to assist in non-core business functions at our facilities. There were no significant variations in total number of employees in 2020. 2020 Sustainability Report - Page 39
102-9	Supply chain	To safely and efficiently manufacture and transport the chemicals and resins that are the building blocks for many consumer and industrial products, we work with over 7,000 suppliers. Hydrocarbons make up the major feedstocks that are processed through many stages to produce the diverse array of final products at our facilities. We also require water, natural gas, electricity and other materials throughout the manufacturing process. We supply to customers in more than 140 countries who convert our materials into useful products, including our own Performance Pipe division.
102-10	Significant changes to the organization and its supply chain	In 2020, CPCChem introduced our Marlex® Anew™ Circular Polyethylene product line, conducting our first certified commercial scale trial at our Cedar Bayou plant. This enhancement to our product portfolio led to a change in the types of suppliers engaged by the organization to include suppliers of pyrolysis oil derived from difficult-to-recycle plastic waste.
102-11	Precautionary principle or approach	100% of our commercial products are assessed against our Operational Excellence System's product stewardship guidelines. CPCChem's product portfolio review is prioritized based on a weighted composite score of environmental outcomes, end use, physical and human hazards, regulatory profile, distribution exposure, production volume, public perception and marketing. Annual reviews of associated hazard communication documents, transport options, customer feedback, regulatory and technical data are also completed by every product line. Our Product Risk Management Teams proactively provide an additional level of diligence to ensure that any changes to processes do not pose risks to the safety and compliance of our products. Statement of Principles



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GRI Standard	Disclosure Description	Response/Comments/Omission
GRI 102: General Disclosures 2016		
102-12	External initiatives	<p>We participate in many initiatives that promote sustainable operations and tackling global issues. These organizations include:</p> <ul style="list-style-type: none"> • Responsible Care • Voluntary Protection Programs • Operational Clean Sweep® (OCS®) and OCS® Blue • Alliance to End Plastic Waste • Circular Plastics Alliance • Circulate Capital Ocean Fund • Wrap Recycling Action Program (W.R.A.P.) • Advanced Recycling Alliance for Plastics
102-13	Membership of associations	The associations with which we have significant involvement include: American Chemistry Council, PlasticsEurope, Texas Chemical Council, Cefic (The European Chemical Industry Council), World Plastics Council, American Fuel & Petrochemical Manufacturers.
Strategy		
102-14	Statement from senior decision-maker	2020 Sustainability Report - Page 3
Ethics and integrity		
102-16	Values, principles, standards, and norms of behavior	<p>Our tagline -<i>Performance by design. Caring by choice.</i>[™] - tells the story of who we are as a company, one that is designed to deliver industry-leading performance and has an employee base that cares about each other, our work, our customers, our communities and our investors. Our license to operate is ensured by the integrity with which we meet our compliance obligations and the level of ethics to which we hold our employees, suppliers and customers. Our core values of safety, respect, integrity and drive are indicative of our approach to maintaining our respected reputation with our stakeholders. Our ethics and compliance program includes roles for a cross-section of stakeholders, from our Board of Directors to front-line supervisors and employees. CPChem maintains its own Code of Conduct (“Code”), which reflects our core values and highlights the principles that guide our conduct. This Code applies to CPChem’s employees and the employees of its wholly-owned or controlled subsidiaries. More information can be found in the 2020 Sustainability Report on our Code.</p> <p>2020 Sustainability Report - Page 36</p>
Governance		
102-18	Governance structure	<p>Ownership and Board of Directors</p> <p>2020 Sustainability Report - Page 8</p>
Stakeholder engagement		
102-40	List of stakeholder groups	<p>We identify our stakeholders as employees, communities, NGOs, governments, financial institutions, suppliers, customers, and the industry trade sector.</p> <p>Stakeholder identification and engagement</p>
102-41	Collective bargaining agreements	<p>CPChem prides itself on preserving strong relationships with its represented employees. We strive to negotiate agreements that foster cooperation and productivity, ensuring the continued safety and success of our company and employees. As of December 31, 2020, 698 employees (14.8% of total workforce) were covered by collective bargaining agreements. Information on represented employees is provided in the Performance Data Tables within the 2020 Sustainability Report.</p> <p>2020 Sustainability Report - Page 39</p>
102-42	Identifying and selecting stakeholders	<p>We identify our stakeholders as employees, communities, NGOs, governments, financial institutions, suppliers/customers and the industry trade sector. These stakeholders were identified carefully through internal meetings and the support of advisors. We leverage different platforms to engage with each stakeholder group to receive feedback on key issues as it pertains to our business.</p> <p>Stakeholder identification and engagement</p> <p>2020 Sustainability Report - Page 10</p>



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GRI Standard	Disclosure Description	Response/Comments/Omission
GRI 102: General Disclosures 2016		
102-43	Approach to stakeholder engagement	Stakeholder identification and engagement 2020 Sustainability Report - Page 10
102-44	Key topics and concerns raised	<p>The most important concerns identified by each stakeholder group in our 2020 Key Issue Assessment process are listed below. We aim to provide context on our efforts and progress with each of these topics in the 2020 Sustainability Report. CPChem is also working to develop goals and targets around many ESG issues to track and demonstrate progress.</p> <ul style="list-style-type: none"> • Communities: Community and stakeholder relations, Environmental management, Ethics, integrity and transparency, Occupational health and safety, Operational integrity, emergency preparedness and response, socioeconomic contribution • Customers: Circular products, Ethics, integrity and transparency, GHG emissions and climate change risk, Labor rights, Occupational health and safety, Operational integrity, emergency preparedness and response, Product responsibility, Supply chain responsibility • Employees: Operational integrity, emergency preparedness and response, Occupational health and safety, Supply chain responsibility • NGOs: Circular products, Energy efficiency, Environmental management, Ethics, integrity and transparency, Water management • Industry Group/Trade Sector: Public policy and advocacy, Sustainable innovation and technology • Financial Institutions: Corporate governance, Environmental management, Ethics, integrity and transparency, GHG emissions and climate change risk
Reporting practice		
102-45	Entities included in the consolidated financial statements	<p>CPChem is a privately held company and does not make its financial statements public, however, the following entities are material to CPChem's consolidated financial statements as of December 31, 2020:</p> <ul style="list-style-type: none"> • Chevron Phillips Chemical Company LP • SouthTex 66 Pipeline Co, Ltd. • Americas Styrenics LLC • Qatar Chemical Company Ltd. • Qatar Chemical Company II Ltd. • Ras Laffan Olefins Company • Chevron Phillips Singapore Chemicals (Private) Limited • Saudi Chevron Phillips Company • Jubail Chevron Phillips Company • Saudi Polymers Company • Gulf Polymers Distribution Company FZCO • Chevron Phillips Chemicals Int'l N.V. • Aromatics Distribution Company FZCO <p>The 2020 Sustainability Report covers all wholly owned operations and joint venture operations where CPChem employees participate in the operations and/or management of the facilities. Americas Styrenics LLC is not covered in CPChem's Sustainability Report. For more information on Americas Styrenics, visit www.amsty.com/sustainability</p>
102-46	Defining report content and topic boundaries	<p>Our 2020 Sustainability Report, <i>Progress through Transformation</i>, aims to communicate a transparent account of CPChem's sustainable growth business strategy, operations and progress in areas deemed significant by our stakeholders. Key issues identified through our materiality assessment span our impacts on people, the planet, and the company's performance, and these three areas serve as the structure of our 2020 Sustainability Report.</p> <p>2020 Sustainability Report - Page 4</p>



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GRI Standard	Disclosure Description	Response/Comments/Omission
GRI 102: General Disclosures 2016		
102-47	List of material topics	<p>Key issues identified in our 2020 Key Issue Assessment are listed below. Order is not indicative of level of importance. Some key issues included in our materiality assessment that were identified as a low priority by our stake holders, (ex. land use and biodiversity) may not be included in this GRI Content Index.</p> <ul style="list-style-type: none"> • Energy efficiency • Environmental management • GHG emissions and climate change risk • Land use and biodiversity • Water management • Community and stakeholder relations • Diversity, racial equity and inclusion • Employee experience • Labor rights • Occupational health and safety • Workforce resilience • Corporate governance • Ethics, integrity and transparency • Public policy and advocacy • Supply chain responsibility • Circular products • Operational integrity, emergency preparedness and response • Product responsibility • Socioeconomic contribution • Sustainable innovation and technology <p>2020 Sustainability Report - Page 10</p>
102-48	Restatements of information	Restatements of information are detailed in this GRI Content Index for each Topic Specific Disclosure.
102-49	Changes in reporting	Material topics included in the 2020 Sustainability Report have been updated based on the results of the 2020 Key Issue Assessment. Material topics included in previous report are as follows: Health & Safety, Product Responsibility, Emissions & Waste, Social Enrichment, Integrity & Compliance, Resource Efficiency and Economic Performance. Material topics included in this years report can be found in disclosure 102-47. In an effort to improve the transparency and completeness of our topic specific disclosures, several disclosures have been expanded to include data of joint venture operations in which CPChem participates in the operations or management of the asset. These changes have been detailed in this GRI Content Index for each Topic Specific Disclosure in which the change was made.
102-50	Reporting period	January 1, 2020 - December 31, 2020
102-51	Date of most recent report	June 30, 2020
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	Danielle Gore, Americas Sustainability Advisor - sustainability@cpchem.com
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core Option. Additional disclosures have been included for enhanced transparency.
102-55	GRI content index	This GRI Content Index is intended to be a supplement to the 2020 Sustainability Report. Information disclosed within our Sustainability Report or on our public website can be found by navigating to the page number or link provided and may not be restated within this index.



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GRI 102: General Disclosures 2016		
102-56	External assurance	CPChem engaged KERAMIDA, an independent third-party, to provide limited assurance of our 2020 Sustainability Report to the GRI Standards. KERAMIDA issued an Independent Limited Assurance Report in connection with the Assurance of the Sustainability Report from CPChem to the GRI Standards. View the KERAMIDA statement here.

Topic Specific Disclosures

GRI Standard	Disclosure Description	Response/Comments/Omission
Economic Topics		
201: Economic Performance		
201 - Management Approach		Information on the management of this topic is provided in the 2020 Sustainability Report. CPChem is a privately held company and does not produce a Form 10-K. 2020 Sustainability Report - Page 37
201-1	Direct economic value generated and distributed	CPChem is a privately held company and does not make its financial statements public, however, select financial information is provided in the Performance Data Tables of the 2020 Sustainability Report and available publicly on our website. 2020 Sustainability Report - Pages 38-41
201-2	Financial implications and other risks and opportunities due to climate change	CPChem is a privately held company and does not make its financial statements public. For more information on how we manage climate risk view Managing Climate Change Risks . 2020 Sustainability Report - Page 25
205: Anti-corruption		
205 - Management Approach		Our ethics and compliance program includes roles for a cross-section of stakeholders, from our Board of Directors to front-line supervisors and employees. This program is managed by the Ethics and Compliance Office, which is part of the Chevron Phillips Chemical Legal Department, reporting to our Chief Compliance Officer. The Ethics and Compliance Office is responsible for providing guidance on compliance matters, training personnel, investigating compliance concerns, and reviewing compliance provisions in contracts. Anti-Corruption is included in our Code of Conduct. Additional policies are in place for specific topics, such as, fraud and conflict of interest. CPChem's Supplier Principles of Conduct 2020 Sustainability Report - Page 36
205-1	Operations assessed for risks related to corruption	Our regulatory risk assessment process is managed by our Ethics and Compliance Office. Risk assessments are completed every two years at our facilities worldwide, spanning 15 risk areas to determine factors that could impact compliance with relevant regulations and laws. Once a risk is identified, we may leverage policies, training, communications, audits or other existing models to mitigate.
205-2	Communication and training about anti-corruption policies and procedures	100% of employees, including CPChem leadership, are required to complete the Code of Conduct Training and review the Code of Conduct annually, which includes information regarding anti-corruption.



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GRI Standard	Disclosure Description	Response/Comments/Omission
Environmental Topics		
302: Energy		
302 - Management Approach		All facilities are required through our Operational Excellence (OE) System to maintain programs that promote the continual improvement in energy consumption and efficiencies. Nearly 13 years ago, we established energy baselines for each of our facilities and local Energy Best Practice Teams at each unit to monitor usage, improve energy performance and initiate energy reduction projects at each site. The corporate energy team is composed of a representative from each local team as well as a corporate team lead. This team focuses on sharing successes and establishing corporate energy goals. Additional information on the management of this topic is provided in the 2020 Sustainability Report. 2020 Sustainability Report - Page 27
302-1	Energy consumption within the organization	Our 2020 global energy consumption was 210 million MMBtu. CPChem tracks energy consumed from fuels as a by-product and the energy purchased and consumed (purchased fuel, electricity and steam) for its manufacturing facilities. Fuels included in this disclosure are natural gas and other fuel gases or fuel byproducts consumed by our manufacturing facilities but exclude fuels used for mobile and stationary sources like diesel and gasoline. This excludes administrative offices. The compilation of our energy consumption data is consistent with the methods used by American Chemistry Council (ACC) for the ACC Energy Efficiency and Greenhouse Gas Annual Survey. For plants where CPChem has partial equity ownership, the reported energy consumption and production data represent the equity stake. For a breakdown of our energy consumption visit the Performance Data Tables in our 2020 Sustainability Report.
302-3	Energy intensity	The 2020 Energy Intensity Index was 0.94 and 0.81 for US and European operations respectively. Our global Energy Intensity Index, excluding facilities in Qatar, was 0.930 compared to 0.932 in 2019. We monitor energy reduction progress using an Energy Intensity Index that establishes a baseline expected energy consumption per pound of product for each unit. The baseline was established in 2008 for the U.S., Belgium and Singapore facilities and is used as the comparison point for each subsequent year. The Energy Intensity Index is a ratio of the actual energy consumed over an expected baseline energy number. The Energy Intensity Index includes fuel, electricity and steam consumption within the organization from wholly owned assets and the equity share of JV assets where pursuant to contract, CPChem employees participate in the operation of the facilities. 2020 Sustainability Report - Page 40
302-4	Reduction of energy consumption	Our global Energy Intensity Index decreased by 0.002 in 2020 compared to 2019 performance. This decrease in Energy Intensity Index is equivalent to approximately 544,730 MMBtu.
303: Water and Effluents 2018		
303 - Management Approach		Information on the management of this topic is provided in the 2020 Sustainability Report. 2020 Sustainability Report - Page 28
303-1	Interactions with water as a shared resource	At our facilities, water is consumed in manufacturing processes and used for cooling, steam production and the disposal of effluents. We use surface, ground and seawater, sourced directly and through third parties. According to the World Resources Institute Aqueduct Water Risk Atlas, three CPChem wholly owned facilities are in areas of high-water stress risk. CPChem does not currently have water related goals. Complete information on this disclosure has not been provided in this GRI Content Index, but CPChem plans to provide this information in future reports. 2020 Sustainability Report - Page 28
303-2	Management of water discharge-related impacts	We manage our water discharge and water quality according to our permitted limits. Our facilities are reviewed regularly for the potential to adversely affect groundwater. These reviews and other provisions are incorporated into our OE System, which is utilized to ensure compliance with all water discharge requirements.

GRI Standard	Disclosure Description	Response/Comments/Omission
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303: Water and Effluents 2018

303-3	Water withdrawal	Total water withdrawal in 2020 was 570 thousand mega liters. Total freshwater withdrawal was 53.2 thousand mega liters. The Freshwater Withdrawal graph in our 2020 Sustainability Report presents the sum of measured and estimated freshwater intake at all our facilities worldwide, including purchased desalinated water. This data does not include water that is treated and directly transferred to another party. This data does not include seawater that is used for cooling at our facilities in Singapore, Qatar and Saudi Arabia to help preserve freshwater resources. Seawater data is included in our Performance Data Tables . All other water withdrawal in the Performance Data Tables represent freshwater (<1,000mg/L Total Dissolved Solids). For joint venture facilities where CPChem has partial equity ownership and participates in the operation of the facility, the reported water intake data represent the equity stake. Not currently tracking water withdrawal, discharge and consumption specifically for areas with elevated water stress levels, but may disclose this information in the future.
303-4	Water discharge	2020 global water discharge was 570 thousand mega liters. A breakdown of water discharge by destination is provided in the 2020 Performance Data Tables. Not currently tracking water withdrawal, discharge and consumption specifically for areas with elevated water stress levels, but may disclose this information in the future. 2020 Sustainability Report - Page 41
303-5	Water consumption	The difference between water withdrawal and water discharge in 2020 was 31 thousand mega liters. Consumption data includes water lost due to evaporation. Not currently tracking water withdrawal specifically for areas with elevated water stress levels, but may disclose this information in the future. 2020 Sustainability Report - Page 41

305: Emissions

305 - Management Approach	<p>To learn about how we manage greenhouse gas emissions visit our 2020 Sustainability Report. The compilation of our greenhouse gas emissions data in 2020 is consistent with the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD) Greenhouse Gas Protocol, with the exception of the definition of organizational boundary. Compilation of emissions data from prior years is consistent with the methods used by ACC for the ACC Energy Efficiency and Greenhouse Gas Annual Survey. 2020 Sustainability Report - Pages 23-26</p> <p>Organizational Boundary: All emissions that are stated, "equity share" are the sum of emissions from wholly owned assets and the equity share of JV assets where pursuant to contract, CPChem employees participate in the operations and/or management of the facilities (QChem, QchemII, RLOC, SPCo, SCP, JCP, CSPC); reported quantities do not include Americas Styrenics facilities or CPChem Pascagoula. Emissions resulting from operations at Pascagoula, Mississippi are included in the reported Scope 1 and 2 emissions of Chevron Corporation U.S.A. Reported emissions include operated facilities as well as administrative offices.</p> <p>Emissions Factors (EF) and Global Warming Potentials (GWP): For 2020 data, emissions factors are set according to the GHG Protocol based on the latest IPCC GWP 100-year time horizon (excluding biogenic emissions) factors, IPCC Assessment Report 5. For prior years IPCC GWP 100-year time horizon factors from IPCC Assessment Report 3 were used. U.S. Electricity emissions factors are based on U.S. EPA emissions rate (eGRID2018). Electricity emissions factors for prior years are based on national averages.</p> <p>Reportable Emission Events data represents the number of total reportable emission events by year. All reportable emission events are reported based on specific country, state or local regulations. A reportable emission event includes air, water or land releases above the Reportable Quantity (RQ), exceedance of a water discharge limit (permit and regulatory), and emissions events as defined in local regulations or permit conditions that require immediate agency reporting. All reportable emission events, including those resulting from activities such as startup from the new construction and events beyond facility control (ex. weather, power and feed interruptions) are represented.</p>
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305: Emissions		
305-1	Direct (Scope 1) GHG emissions	CPChem's total Scope 1 emissions in 2020 was 7.4 million metric tons of CO ₂ e. Reported emissions include CO ₂ , CH ₄ , N ₂ O and HFCs represented in equivalents of CO ₂ based on the GWP factors from IPCC Assessment Report 5. Previously reported Scope 1 emissions for 2018 and 2019 has been revised. An error identified in natural gas accounting at one facility is the source of the correction. 2020 Sustainability Report - Page 40
305-2	Energy indirect (Scope 2) GHG emissions	CPChem's total Scope 2 emissions in 2020 was 2.4 million metric tons of CO ₂ e. Electricity emissions factors include CO ₂ , CH ₄ and N ₂ O. 2020 Sustainability Report - Page 40
305-3	Other indirect greenhouse gas (GHG) emissions (Scope 3)	CPChem does not currently track Scope 3 emissions but may report this information in the future.
305-4	GHG emissions intensity	CPChem's global GHG emissions intensity in 2020 was 0.53 tonnes CO ₂ e/tonnes product. The Global GHG Intensity is a ratio of the greenhouse gases emitted (tonnes of CO ₂ e) divided by the products produced (tonnes of product). Emissions intensity calculation includes CO ₂ , CH ₄ , N ₂ O and HFCs represented in CO ₂ equivalents based on the GWP factors from IPCC Assessment Report 5. 2020 Sustainability Report - Page 40
305-7	Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	The Air Emissions graph in our 2020 Sustainability Report includes the total aggregated criteria pollutants (NO _x , CO, VOC, PM ₁₀ , SO ₂) emitted. The data only includes permitted emissions from each source collected from the Emissions Inventory. The Global Emissions Inventory Intensity is a ratio of the aggregated pollutants emitted (tons of emissions) over the products produced (thousand tonnes of product).
306: Effluents and Waste		
306 - Management Approach		<p>Waste</p> <p>In addition to maintaining strict adherence to local regulations on waste disposal, our management of waste is governed by our Operational Excellence System which sets requirements for all facilities to follow regarding the disposal of wastes. Facilities are required to maintain procedures for waste management methods, document characterizations of all waste streams, perform an annual evaluation of waste management practices and maintain waste minimization procedures. We maintain an internal Waste Disposal Contractor Review and Approval Procedure, as well as a list of approved waste disposal facilities, to ensure that waste is disposed properly off-site. Facilities are also required to have Spill Prevention, Control and Countermeasures Plans, and Hazardous Waste Contingency Plans, where applicable, for emergency response planning. 2020 Sustainability Report - Page 30</p> <p>Water Quality</p> <p>We manage our water discharge and water quality according to our permitted limits. Our facilities are reviewed regularly for the potential to adversely affect groundwater. These reviews and other provisions are incorporated into our Operational Excellence System, which is utilized to ensure compliance with all water discharge requirements. 2020 Sustainability Report - Page 28</p>
306-2	Waste by type and disposal method	CPChem's total hazardous and non-hazardous waste production in 2020 was 39.7 thousand tonnes. Waste data includes non-hazardous and hazardous waste by weight transported off site for disposal. Currently disposal method is not disclosed, but we are working to include this information in future reports. For plants where CPChem has partial equity ownership, the reported waste data represents the equity stake. 2020 Sustainability Report - Page 41
307: Environmental Compliance		
307 - Management Approach		We operate in accordance with relevant laws and regulations applicable to us, including but not limited to, those concerning labor, employment, the environment, health and safety. Our OE System includes expectations and requirements to ensure compliance with environmental, health, safety and security laws, regulations and internal policies. Facilities, corporate groups, product lines and administrative offices are required to complete annual self-audits and are subject to regular corporate and third-party audits to ensure compliance with the standards outlined in our OE System.



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GRI Standard	Disclosure Description	Response/Comments/Omission
307: Environmental Compliance		
307-1	Non-compliance with environmental laws and regulations	Nine orders and penalties resulting in \$210,829 total penalty amount in 2020.
308: Supplier Environmental Assessment		
308 - Management Approach		<p>Our Supplier Principles of Conduct includes environmental expectations for our suppliers. In addition to full compliance with all applicable environmental laws, CPChem expects suppliers to integrate environmentally responsible and sustainable practices into their operations. Suppliers should endeavor to minimize adverse impacts on the community, environment and natural resources and ensure the protection of the health and safety of all workers, contractors and subcontractors, and residents of the communities in which we operate. Suppliers are asked to identify and act on opportunities to reduce their environmental impacts in a meaningful way, and to share those results with us when requested. Environmental topics included in our Supplier Principles of Conduct are as follows: environmental permits and reporting, hazardous materials and waste management, transportation, materials restrictions, energy consumption and GHG emissions, and pollution prevention.</p> <p>2020 Sustainability Report - Page 37</p>
308-1	New suppliers that were screened using environmental criteria	Suppliers are assessed for health and safety criteria, but are not currently screened for other social or environmental data. CPChem is working on a plan to capture this information as we continue to develop and implement supplier programs. This information may be disclosed in the future.
Social Topics		
401: Employment		
401 - Management Approach		<p>Recruitment</p> <p>CPChem employs experts in recruiting and utilizes this expertise to attract and hire the best candidates. In 2020, CPChem examined and rebuilt its recruitment strategy for upcoming graduates. As a result, our new graduate recruitment program is more inclusive of people of color and better-designed to attract candidates with diverse backgrounds and experiences. Our recruitment teams undergo hours of extra training in areas such as unconscious bias, diversity, and interview tactics to cast a wide net of candidate inclusion and ensure every candidate's experience is positive and engaging. Additionally, we value our employees' contributions to the candidate recruitment process through referrals, as it not only gives us more access to employees' networks, but it also inspires employee engagement throughout the organization. CPChem shifted to a centralized recruiting process in 2019. The strategic move has reduced the time from posting a position to filling that position by 48%, demonstrating the power of an efficient model.</p> <p>Benefits and Compensation</p> <p>In 2019, we distributed a Global Rewards Survey. In this survey, we asked employees to offer their personal views on the compensation, benefits and HR policies at CPChem. In addition to leveraging feedback on decisions regarding Total Rewards, these responses are being used to generate action plans that guide recruiting and retention efforts of our ever-changing workforce. We identify appropriate salary programs and benefits through Compensation, Benefits and Investment Committees established by the Board of Directors. The Compensation Committee meets at least three times each year, the Benefits Committee meets at least twice a year, and the Investment Committee meets at least four times a year to provide input and approvals for compensation and benefits programs to ensure these programs remain competitive within the petrochemical industry and aligned with the company's goals. An area that CPChem is particularly proud of is its pension program, a highlight within our benefits program portfolio that encourages employees to invest their time and experience in our company as we invest in them.</p>
401-1	New employee hires and employee turnover	<p>In 2020, 243 employees were hired into the organization while 329 employees left the organization or retired. This decrease in total hires is attributed to cost savings mitigations due to economic downturn. The company's overall attrition rate was 6.9% with a voluntary attrition rate of 2.6%, less retirements. Not currently disclosing turnover or new hires by gender, age and region, but may disclose this in the future.</p> <p>2020 Sustainability Report - Page 39</p>



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GRI Standard	Disclosure Description	Response/Comments/Omission
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401: Employment		
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401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	<p>CPChem offers a comprehensive total rewards program that addresses our employees’ physical, mental and financial health including:</p> <ul style="list-style-type: none"> • Medical, dental, prescription drug coverage and vision discount plan • Life insurance, long-term disability, supplemental life, ADPL insurance and dependent life insurance • Health care and dependent care flexible spending accounts • Flexible work arrangements for qualified employees at many locations • Profit sharing • Pension plan • Parental leave • Bonus program, Merit program and Immediate rewards program • Matching 401(k) • Relocation assistance • Educational assistance/tuition reimbursement • 9/80 work schedule at many locations • Employee assistance program and behavioral health plan • Matching charitable gifts for education and cultural organizations <p>Health care and life insurance benefits are provided to part-time employees working at least 20 hours per week and temporary employees. Part-time employees are eligible to participate in the 401(k) plan. Other benefits may be adjusted based on work schedule, and all benefits are subject to change at the company’s discretion at any time.</p>
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401-3	Parental leave	<p>In 2020, 179 employees took parental leave. Parental leave utilization by gender is not tracked as an internal metric. Return to work and retention rates following parental leave are not tracked. Currently, there is no methodology for determining parental leave entitlement while respecting employee privacy. However, CPChem tracks trends of parental leave utilization through internally defined metrics. 2019 was the first full year in which the parental leave policy was in place and therefore, data prior to 2020 is not included in the Performance Data Tables.</p>
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403: Occupational Health and Safety		
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403 - Management Approach		<p>EHSS Strategy</p> <p>Our <i>Journey to Zero</i> , introduced in 2016, is a blueprint to achieve what is already a clear objective for CPChem: To eliminate events that could inflict serious–or even fatal–injuries to employees or contractors, or result in severe process safety events. This imperative effort builds on the many successful initiatives already embedded in our safety culture, including the Life Saving Rules, Tenets of Operation and our Guiding Principles.</p> <p>Our nine Life Saving Rules relate to activities that, if not executed correctly every time, have a high potential for serious injury or fatality. Our Tenets of Operation guide our decision-making every day and in every task. These ten statements provide a universal code of conduct to guide our decision-making every day and in every task. The Tenets are fundamental risk management practices that reduce risks in the workplace. As we move toward zero, we ask our employees to take the time to do the job right every time, reduce their individual risk, understand and follow established procedures, speak up and keep learning. (cont.)</p>
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GRI Standard	Disclosure Description	Response/Comments/Omission
403: Occupational Health and Safety		

Management System

Our OE System is a risk management process that provides a global framework that aims to help CPChem standardize our efforts, continuously improve and raise the level of operational discipline in areas of Environment, Health, Safety, Security, Reliability and Quality. It is built upon expectations for involved and effective leadership, full employee participation, compliance with all regulatory requirements, and integration of OE into ongoing improvement of all business results.

The OE System includes five components: 1) Policy; 2) Principles; 3) Focus Areas; 4) OE Expectations, Global OE Standards, and Required Manufacturing Standards; and, 5) Verification of Compliance and Management System. These components comprise our management system. Furthermore, the OE System is structured to fulfill American Chemistry Council (ACC) and the International Council of Chemical Associations (ICCA) Responsible Care Management System® (RCMS®) requirements.

The OE system covers the following Occupational Health and Safety related topics:

- Occupational Health & Safety
- Product Stewardship & Product Safety
- Process Safety
- Security
- Emergency Preparedness and Response

Operational Excellence Review Process

Our Corporate OE Review collects data relating to the various OE practices and regulatory compliance at individual facilities and identifies items or issues that will assist in continual improvement activities. The process includes 10 Critical Operational Risk Systems and Six Safety Culture Drivers. The purpose of the safety culture assessment is to determine both positives and vulnerabilities of day-to-day OE processes. This is accomplished by conducting culture interviews of targeted populations of facility personnel. In addition, the revamped process now includes scoring for each Operational Risk System and Culture Driver.

The primary purpose of the Corporate PSM/RMP Compliance Audit is to collect data relating to the implementation of the OSHA Process Safety Management (PSM) Standard and the EPA Risk Management Program (RMP) Rule's required elements at individual facilities to ensure continuing compliance. Domestic petrochemical facilities will have a combined OSHA PSM and EPA RMP Compliance Audit conducted concurrently. While our international petrochemical facilities are not subject to OSHA's PSM Standard, each has voluntarily adopted the elements of OSHA's PSM Standard and are audited against those elements.

Voluntary Protection Program

With the addition of Performance Pipe's Plano office which earned Star Site designation in January 2019, all 18 of CPChem's eligible U.S. locations now hold Star Status, the highest Voluntary Protection Program (VPP) certification given by the U.S. Occupational Safety and Health Administration (OSHA). As OSHA notes, the "Star program is designed for exemplary worksites with comprehensive, successful safety and health management systems. Companies in the Star Program have achieved injury and illness rates at or below the national average of their respective industries. These sites are self-sufficient in their ability to control workplace hazards. Star participants are reevaluated every three to five years, although incident rates are reviewed annually.

More information on the management of this topic is provided in the 2020 Sustainability Report in addition to these webpages:

- [Our Journey to Zero \(EHSS Strategy\)](#)
- [Operational Excellence System \(Management System\)](#)
- [Sustainability Report - Pages 18-20](#)

403 - Management Approach (cont.)



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GRI Standard	Disclosure Description	Response/Comments/Omission
403: Occupational Health and Safety		
403-1	Occupational health and safety management system	All employees and contractors are covered by the occupational health and safety management system.
403-2	Hazard identification, risk assessment, and incident investigation	Refer to management approach for information on this topic. Complete information on this disclosure has not been provided in this GRI Content Index, but CPChem plans to provide this information in future reports.
403-3	Occupational health services	Refer to management approach for information on this topic. Complete information on this disclosure has not been provided in this GRI Content Index, but CPChem plans to provide this information in future reports.
403-4	Worker participation, consultation, and communication on occupational health and safety	Refer to management approach for information on this topic. Complete information on this disclosure has not been provided in this GRI Content Index, but CPChem plans to provide this information in future reports.
403-5	Worker training on occupational health and safety	Safety training is essential to developing a safety mindset and to help employees and contractors adopt our safety culture, which leads to more effective performance. Our people need the right knowledge and tools to embrace our safety culture. We require training on <i>Our Journey to Zero</i> , Life Saving Rules, risk tolerance, Front Line Leadership, plant turnarounds and more. We also hold project safety and engagement workshops and seasonal campaigns like “Summer of Safety” to keep safety top of mind at all times.
403-6	Promotion of worker health	CPChem provides medical, dental, prescription drug coverage and vision discount plan for employees. The company also provides a program, "Your Journey to Wellness" that is designed to help employees reach physical and financial well being, including fitness program reimbursements and cash incentives for participation in preventative care activities.
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Refer to management approach for information on this topic. Complete information on this disclosure has not been provided in this GRI Content Index, but CPChem plans to provide this information in future reports.
403-8	Workers covered by an occupational health and safety management system	All employees and contractors are covered by the occupational health and safety management system.
403-9	Work-related injuries	In 2020, excluding COVID-19 recordable illnesses, employees and contractors achieved the lowest Recordable Incidence Rates (RIR) of 0.05. Disclosures on work-related injuries are included in the Performance Data Tables of the 2020 Sustainability Report. We follow the OSHA Standard (29 CFR 1904) on Recording and Reporting Occupational Injuries and Illnesses for classifying and reporting all injuries/illnesses occurring at facilities globally. Recordable Incidence Rate is defined as the number of recordable injuries/illnesses per 200,000 hours worked (or approximately 100 full-time workers) annually. TRIR for employees and contractors exclude Major Capital Project (MCP) hours. 2018-2020 data for MCP is low due to lack of MCP work in these years. Complete information on this disclosure has not been provided in this GRI Content Index, but CPChem plans to provide this information in future reports. 2020 Sustainability Report - Page 40

404: Training and Education

404 - Management Approach	<p>Training and continuing education remain cornerstones of employee development at CPChem. As a result of feedback from employees in previous Global Employee Surveys, we have focused heavily on increasing the amount of high-quality learning and development opportunities throughout the company. All employees undergo regular training in areas within and outside their job role based on their defined training plan. In 2019, we conducted an extensive review of all training programs. Given the stark differences noticed in responsibilities required of those working in office or plant roles, a new centralized training system was launched. This centralized training system utilizes online modules to offer extensive learning opportunities and empowers and authorizes managers to dictate appropriate programs based on site-specific needs and requirements. The online system has been a valuable tool that supplements our existing hyper-specialized instructional programs already in place around the company. In addition to job training, continuing education is encouraged through education assistance program and tuition reimbursement for employees pursuing applicable degree programs.</p>
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GRI Standard	Disclosure Description	Response/Comments/Omission
404: Training and Education		
404 - Management Approach (cont.)		To deepen the knowledge base of our workforce, employees are required to submit personal development objectives that reflect their personal interests. Every submission is carefully reviewed to identify potential opportunities for that employee's further enhancement of skills. Employees are allotted an additional budget for professional development every year and are encouraged to seek internal and external opportunities to achieve their development objectives. 100% of employees receive regular performance reviews and supervisors are trained to work closely with employees to foster growth throughout their time at CPChem.
404-1	Average hours of training per year per employee	265,302 hours of classroom and online training were completed by CPChem employees in 2020, resulting in an average of 56.3 hours of training per employee. This disclosure only includes April 2020 – December 2020 data for classroom trainings due to changes in tracking these courses. 2019 data in the Performance Data Tables only includes online training and does not include classroom training. This disclosure does not include hours for any external trainings taken by employees and paid for by the company. Training is assigned based on job category. Training opportunities are required and made available to all employees regardless of gender. Training is not currently tracked by gender and employee category. 2020 Sustainability Report - Page 40
404-3	Percentage of employees receiving regular performance and career development reviews	All employees are required to receive regular performance reviews regardless of gender or job category.
405: Diversity and Equal Opportunity		
405 - Management Approach		<p>Our ICARE principles - Inclusion, Cooperation, Accountability, Respect Everyday - reflect how we choose to practice D&I as a company. We view diversity as more than just one's country of origin, gender or race. Diversity is about the blending of experiences, cultures, talents, competencies, differing perspectives and decision-making styles. We strive to create a culture that respects unique differences and recognizes the perspectives of all our employees. Diversity in all of its dimensions is valued at CPChem. It is fundamental to the quality of our products and services and is crucial to our continued success.</p> <p>Executive Diversity Council The Executive Diversity Council sits at the helm throughout our diversity and inclusion journey. This specialized council is comprised of members from senior leadership and other leaders from across the company including representatives from the company's Asian and European locations. Working together, this important group provides leadership, guidance and direction in the advancement of CPChem's diversity and inclusion objectives.</p> <p>Diversity Ambassadors and Diversity Councils Diversity Ambassadors and Diversity Councils form the core of organized grassroots support of the company's diversity and inclusion efforts. Selected by local management at each of our sites and approved by the Executive Diversity Council, ambassadors and council members play a key role in communicating principles and engaging the local workforce. Working in tandem with local management, ambassadors and council members engage in activities such as:</p> <ul style="list-style-type: none"> • Build awareness and understanding among employees and support positive workplace behaviors; • Assist local leaders in addressing issues impacting diversity and inclusion; • Model appropriate behaviors and act as agents of change for diversity and inclusion. <p>CPChem conducts annual pay reviews to ensure that pay practices are assessed and adjusted as needed. CPChem also leverages a third-party to perform pay analyses on a regular cadence to identify gaps in its compensation practices. 2020 Sustainability Report - Pages 13-15</p>



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GRI Standard	Disclosure Description	Response/Comments/Omission
405: Diversity and Equal Opportunity		
405-1	Diversity of governance bodies and employees	<p>These metrics exclude our board of directors. Data on the diversity of our employees, managers and senior leadership are provided in the Performance Data Tables in the 2020 Sustainability Report. Metrics disclosed on diversity of employees encompasses all direct employees of CPChem for all job categories, including all management levels.</p> <p>2019 data on women in senior leadership has been restated due to a change in reporting boundary. In previous reports, disclosures on company leadership were made as of report publish date, disclosures on senior leadership are now stated as of December 31 of reporting year end. Senior leadership is defined as any leader with a Vice President, Senior Vice President, Executive Vice President, President or Chief Executive Officer title. Visible diversity is defined as employees who are of color and/or female for US Dollar employees.</p> <p>2020 Sustainability Report - Page 40</p>
414: Supplier Social Assessment		
414 - Management Approach		<p>Our Supplier Principles of Conduct includes social expectations for our suppliers. Some social topics included in our Supplier Principles of Conduct are as follows: human rights and anti-human trafficking, working conditions, wage and hour practices, diversity and inclusion, subcontractor compliance, health and safety and training.</p> <p>CPChem's Supplier Principles of Conduct</p>
414-1	New suppliers that were screened using social criteria	Suppliers are assessed for health and safety criteria, but are not currently screened for other social or environmental criteria. CPChem is working on a plan to capture this information as we continue to develop and implement supplier programs. This information may be disclosed in the future.
416: Customer Health and Safety		
416 - Management Approach		<p>CPChem remains vigilant in its compliance with regulatory requirements throughout the world. Our commercial products are assessed against our OE System's product stewardship guidelines. In addition to complying with applicable regulations, CPChem, based on the Responsible Care® initiative's Product Safety Code, also evaluates, demonstrates, and continuously improves its product safety performance throughout its product portfolio. Our product portfolio review is prioritized based on a weighted composite score of environmental outcomes, end-use, physical and human hazards, regulatory profile, distribution exposure, production volume, public perception and marketing.</p> <p>Annual reviews of associated hazard communication documents, transport options, customer feedback, regulatory and technical data are also completed by every product line. Our Product Risk Management Teams proactively provide an additional level of diligence to ensure that any changes to processes do not pose risks to the safety and compliance of our products.</p> <p>CPChem has registered under REACH all our substances contained in our products imported/manufactured in the EU in quantities greater than one metric ton. In the U.S., CPChem has been supportive of efforts to modernize the Toxic Substances Control Act (TSCA) to enable our industry to safely innovate and grow, create jobs and maintain the trust of our employees, customers, communities and stakeholders. The company is poised to comply with amendments to TSCA.</p> <p>Each of CPChem's polyethylene production facilities utilizes Good Manufacturing Practices (GMP), as outlined in US 21 CFR 174.5 and EU Commission Regulation (EC) No 2023/2006, when manufacturing Marlex® polyethylene products designed to meet requirements of use in the fabrication of articles that come in contact with food.</p> <p>We are proud to comply with applicable international, federal, state, local and foreign regulations for product quality and labeling. Information on our products is readily accessible via downloadable Safety Data Sheets (SDS) and Product Stewardship Summaries on our corporate website, www.cpchem.com. CPChem provides timely information to deepen understanding about the safety of our products and to assure that they provide their intended benefits while protecting human health and the ecosystem. We actively participate in common sense advocacy efforts, chemical testing programs and children's health initiatives.</p>
416-1	Assessment of the health and safety impacts of product and service categories	100% of our commercial products are assessed against our OE System's product stewardship guidelines.



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