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Health, Safety,
Environment, & Security

Code of Business Conduct

A man in a dark suit, light blue shirt, and green tie stands with his arms crossed against a background of white horizontal slats.

A message from Mark

At Eastman, we encourage and reward productivity, innovation, and ethical decision-making. Because of our commitment to these core values, we have developed a reputation for being a high-performance specialty chemical company that operates with the utmost fairness and integrity. Maintaining that reputation is up to each of us. How we treat each other and how we interact with our suppliers, customers, and vendors will determine how Eastman is viewed by the business world and the communities in which we operate. Every day, we are each personally responsible for upholding these core values and not compromising our integrity when faced with difficult decisions. It is absolutely vital that we act ethically not only to maintain our reputation and comply with laws and regulations, but also because it is simply the right thing to do. As we continue to grow, I am sure that on occasion you will find yourselves in challenging situations and I trust that each of you will continue to do your job to the best of your ability with fairness, honesty, and integrity.

Eastman's Code of Business Conduct is a guide that can help you through this decision-making process if you find yourself in these situations. I encourage each of you to read it and become familiar with its contents so that you will be equipped to make the right choice. If you are ever in doubt as to what you should do or are unclear about Eastman's expectations, please contact Global Business Conduct, your manager, Human Resources, or the Law Department. I assure you that all reports will be handled confidentially, and that anyone who reports in good faith will be protected from retaliation. Raising concerns is an important first step in addressing issues that can affect us all.

I sincerely appreciate your commitment to upholding Eastman's high ethical standards.

A handwritten signature in black ink, appearing to read 'Mark Costa'.

Mark Costa
Chairman & CEO

Elements Of Ethical Business Conduct



Reporting Concerns: We protect Eastman's reputation by asking questions and raising concerns when we encounter challenging situations. Our integrity requires us to speak up honestly when we suspect problems or mistakes, and we hold each other accountable.



Human Rights: We respect the rights and dignity of all team members. We create an inclusive global culture where everyone can do their best work.



Conflict of Interest: In our business activities, we each have a duty to act in Eastman's best interests. We disclose any potential conflicts of interest, allowing our Company to evaluate these issues.



Gifts and Entertainment: We recognize that the exchange of small courtesies with our business partners develops and strengthens relationships—but we never give or receive gifts or entertainment that inappropriately influence business decisions or conflict with our values.



Protection and Use of Company Information: Eastman's proprietary information enables us to compete, innovate, and grow. We must protect this valuable resource from loss, theft, or misuse.



Records Integrity: We are accountable for providing our stakeholders with a reliable representation of Eastman's performance. We are each responsible for the integrity, completeness, and accuracy of the Company records that we prepare or maintain.



Business Partners: We will conduct business only with third parties who share our commitment to complying with legal requirements and maintaining high ethical standards. We expect our business partners to act with integrity, honesty, and transparency.



Business Integrity: We are trustworthy in all relationships. Our actions match our words. We do the right thing at all times.



Health, Safety, Environment, and Security: We are good stewards of our company, environment, and world, ensuring success today and for future generations. We believe all work related injuries are preventable. We watch out for each other and practice injury-free habits at home and at work.

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Introduction

Why is
our Code
important?”

Why Do We Have a Code?

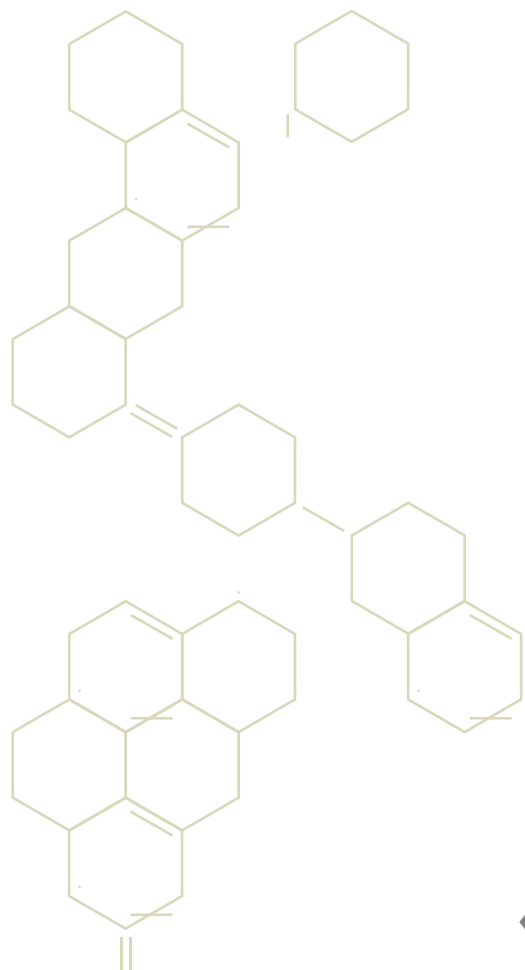
At Eastman, we take pride in doing business with integrity. We believe that it takes more than strong business results to build a great company. The men and women at Eastman have created a culture where integrity is of the utmost importance and unethical behavior will not be tolerated. Our ethical business practices have contributed to building successful relationships with the Company's key stakeholders—our customers, suppliers, shareholders, our fellow team members here at Eastman, and the communities where we live and work. The trust these groups have in us will help Eastman continue to grow and innovate in the future.

This *Code of Business Conduct* ("Code") reflects the essential elements of ethical business conduct necessary for the Company's future success. We use these elements in working together as members of the Eastman team and with the Company's key stakeholders.



Who Must Follow Our Code?

The Code of Business Conduct applies to everyone at Eastman—officers, directors, and team members at all levels. It also applies to Eastman's subsidiaries and in joint ventures ("JVs") to the extent reasonable given Eastman's level of participation. In situations where applying this Code is not possible, we will do everything we can to make sure JVs and JV partners follow similar principles. Use of the terms "Eastman Chemical Company," "the Company," and "Eastman" throughout this document refers collectively to all of these entities.



What Are Our Responsibilities?

Using the Code to guide our actions allows us to preserve our reputation for doing business the right way. To this end, each of us must:

- Read and understand the Code
- Complete training on the Code and other assigned educational courses in a timely manner
- Abide by the Code and report any violation or potential violation by following the procedures outlined in the **“Seeking Advice or Reporting Concerns and Violations”** section of this Code
- Seek advice and guidance when we are not sure of a situation

Holding a management position at Eastman means accepting an additional set of responsibilities. We expect our managers to demonstrate a strong commitment to leadership and teamwork. If you are a manager, you should:

- Lead by example to make sure all team members know and understand this Code, Company policies, and the laws that apply to your area of responsibility
- Create an open door-type environment so that other team members feel comfortable asking questions and reporting concerns
- Understand the risks that exist in your area of responsibility and ensure appropriate controls are in place to mitigate those risks
- Use diligence when reviewing records in your area of responsibility
- Report any violations that you suspect are occurring
- Promptly escalate reports from team members
- Promote training and career development for your direct reports



Our Code and the Law

Eastman's operations and team members are subject to the laws of many countries and other jurisdictions around the world. We are all expected to comply with the Code and all applicable government laws, rules, and regulations. If a provision of the Code conflicts with applicable law, always apply the most stringent standard. Because Eastman is headquartered in the United States, our team members around the world often are subject to U.S. laws. Other countries also may apply their laws outside their borders to Company operations and personnel. If you are uncertain what laws apply to you, or if you believe there may be a conflict between different applicable laws, consult the Law Department before proceeding.

The Role of Global Business Conduct

The role of Global Business Conduct ("GBC") is to help minimize legal risk, protect the Company's brand and reputation, foster a culture of high performance with integrity, and provide team members with a safe haven for reporting concerns. To ensure the ethics and compliance program meets and exceeds its goal, GBC is responsible for the following:

- Promoting a culture that encourages ethical conduct and a commitment to compliance
- Providing a venue for asking questions and reporting concerns confidentially and, when permitted by local law, anonymously
- Providing effective training programs for team members
- Ensuring appropriate and consistent disciplinary actions are taken
- Identifying compliance risks affecting the Company and working to minimize those risks
- Providing information about Company policies to help resolve ethical dilemmas
- Conducting investigations and evaluating reports of misconduct
- Referring team members to resources that can assist in resolving issues

Our ethical business practices have contributed to building successful relationships with our customers, suppliers, shareholders, our fellow team members, and the communities where we live and work.



What Are the Consequences for Violating the Code?

Violations of our Code, policies, or the law may carry serious consequences for Eastman and the individuals involved. We are each accountable for our actions. Individuals who engage in unethical or illegal behavior, and those who direct, condone, approve, or facilitate such behavior, may be subject to disciplinary action up to and including termination, subject to local laws, and in some instances, may be subject to prosecution by governmental entities.

Consistent with our values, our disciplinary process will treat all team members with dignity and respect, and disciplinary measures will be proportionate and consistently applied. We maintain zero tolerance for corporal punishment or mental or physical abuse of personnel, and reject harsh or inhumane treatment.

Remember, unethical behavior places all of us at risk. It can damage reputations, harm our stakeholders, and even may subject us—as individuals or as a Company—to fines and civil or criminal liability. It is in our collective interest to avoid any violations of the Code or the law.

*We are **driven** to do
things **right**.*

If you see something, say something.”

We protect Eastman's reputation by asking questions and raising concerns when we encounter challenging situations. Our integrity requires us to speak up honestly when we suspect problems or mistakes and we hold each other accountable.

Seeking Advice or Reporting Concerns and Violations

Eastman encourages responsible reporting of any potential Code violations. When faced with questionable business conduct, or legal uncertainties, you have a right and an obligation to seek guidance.

Never hesitate to ask for help if you are in a situation and don't know what to do.

Promptly bring to the Company's attention any situations that may be violations of the Code or the law. Timely reporting may be critical in preventing harm.

To ask a question or report a concern, contact:

GLOBAL BUSINESS CONDUCT

TO REPORT YOUR CONCERNS INTERNALLY:

- Call: +1.423.229.5552
- Email: compliance@eastman.com

EASTMAN BUSINESS CONDUCT HELPLINE AND WEBSITE

- Toll-free reporting within the United States: 1.800.455.5622
- If dialing internationally (outside the United States), visit the Eastman Business Conduct Website at www.reportaconcern.eastman.com and select your location from the dropdown list to get the international number assigned to your country.
- WEBSITE ACCESS: www.reportaconcern.eastman.com

The Business Conduct Helpline is a confidential, 24-hour-a-day hotline and is staffed by communications specialists employed by an independent, globally recognized service provider. While it is helpful for the Company to know the identity of the caller, reports can be made anonymously when permitted by local law.

Additional resources for receiving concerns include:

- Human Resources Manager or Human Resources Representative
- Any member of management
- Law Department
- Corporate Audit Services

Investigations

Eastman takes all reports of possible misconduct seriously. Our Company will investigate the matter confidentially, determine whether the Code, Company policy, or the law has been violated, and take appropriate corrective actions. If you are asked to participate in an investigation, cooperate fully and answer all questions completely and honestly. It is Company policy to ensure that all investigations are conducted in compliance with applicable laws.

Q Holly sees one of her coworkers, Jon, saving files to a USB drive, which he then puts in his pocket. She knows that he has gotten a couple of calls recently from recruiters. Holly suddenly wonders if he might be saving confidential Company information onto the USB drive to take with him to a new job. Should Holly say anything? She and Jon are friends and she doesn't want to get him in trouble if she's mistaken.

- ☐ Holly shouldn't say anything—it's really none of her business.
- ☐ Holly should tell Jon that unless he does her a big favor, she'll tell on him.
- ☐ Holly should tell management what she saw, but not who was doing it.
- ☐ Holly should report what she's seen.

No Retaliation

Eastman values your help in identifying potential problems that the Company may need to address. We will not tolerate retaliation. Speaking up is always the right thing to do. No disciplinary action or retaliation will be taken against a team member for bringing a concern to the Company's attention in good faith, even if the investigation determines that no violation could be found. Likewise, the Company will not tolerate retaliation against a team member or other person who cooperates in an investigation. If you ever feel that you have been retaliated against or threatened with retaliation, promptly report the matter to Global Business Conduct.

Expect to be treated with respect.”

We respect the rights and dignity of all team members. We create an inclusive global culture where everyone can do their best work.

Harassment

Respect and fair treatment of all team members

At Eastman, we believe that everyone deserves to be treated with fairness and respect. Harassing behavior creates an uncomfortable workplace where colleagues don't trust each other—which keeps us from reaching our goals. For these reasons, harassment has no place at Eastman and will not be tolerated.

Harassment can be described as any unwelcome behavior that creates an intimidating, hostile, non-inclusive, or offensive work environment. It can take many forms, including verbal remarks, physical advances, inappropriate entertainment, and visual displays, and may come from coworkers, managers, suppliers, contractors, or customers. Further, using or circulating offensive materials, slurs, inappropriate remarks, and “humor” at another's expense undermines respect and is not appropriate for our workplace.



Sexual harassment

Harassment may be sexual in nature. This includes behavior such as unwelcome sexual advances, sexually related jokes or comments, and viewing pornography or other inappropriate materials while at work or using company resources.

Bullying and mobbing

Bullying or *mobbing* is another form of harassment and is defined as systematic, sustained, or repeated hostile behavior—either in-person or through email, social media, and other digital communications—intended to humiliate, isolate, or exclude an individual. Any form of hazing is prohibited. Because we rely on teamwork at Eastman, this type of behavior can hurt everyone involved.

Q *Amber was recently hired in operations. Every day, Amber hears Seth and Chase whistling at her and making inappropriate comments. She is mortified that all the other workers see what is happening. She doesn't want to make any enemies at her new job. What should Amber do?*

A *Amber should not allow this behavior to continue and should report this conduct. Eastman will not tolerate this type of inappropriate behavior in the workplace. All team members who are aware of or witness this type of behavior should report it.*



Diversity

We believe that diverse points of view foster creativity and innovation. An inclusive global culture allows us each to contribute our best to the team.

Diversity is about capitalizing on each of our strengths and minimizing our weaknesses, allowing us to achieve together what we could not as individuals. Diversity makes our Company stronger, more competitive, and a better place for everyone.

Discrimination

Because of our commitment to diversity, we never make employment decisions based on personal characteristics other than skills, abilities, and potential. We will not tolerate discrimination in hiring, compensation, or promotion opportunities based on race, ethnicity, religion, gender or gender identity, sexual orientation, age, disability, national origin, or any status protected by applicable law.



An inclusive global culture allows us each to contribute our best to the team. Diversity makes our Company stronger, more competitive, and a better place for everyone.

Team Member Privacy

We all provide various types of personal data to the Company, and we all share the responsibility for ensuring that this data remains secure and confidential.

Personal data is any information that directly or indirectly identifies a person. This information may include:

- Employment history
- Government-issued identification numbers
- Contact information
- Marital status
- Medical history
- Performance evaluations

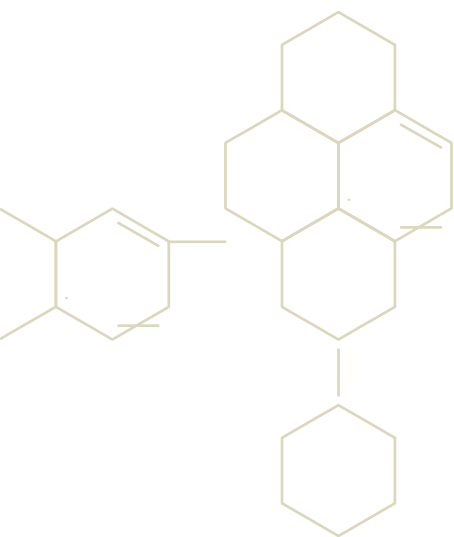
Most countries have laws regulating the collection and use of personal data, although the types of data covered, the nature of the protection, and local enforcement mechanisms vary. If you have access to this information, ensure that you access only the information that is necessary for your job responsibilities, and that you comply with relevant privacy laws at all times.



Freedom of Association and Right to Collective Bargaining

Eastman has a strong and continuing commitment to meet or exceed the needs of its team members. Our policies and practices are designed to support an empowered and highly motivated workforce in an environment marked by open, honest communications and respect for every team member.

Eastman will uphold the freedom of association and recognize the right to collective bargaining, consistent with local laws, and will honor all of its legally mandated obligations.



Human Trafficking, Forced or Compulsory Labor, and Child Labor

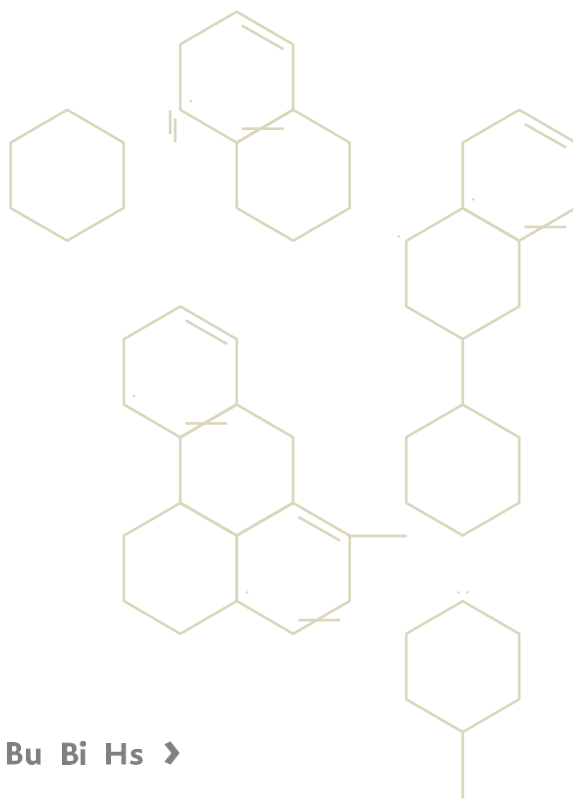
We uphold individual human rights including freedom from forced or compulsory labor and stand firmly against human trafficking. We seek to provide a safe, healthy, and desirable workplace with working conditions, wages, and benefits that meet or exceed applicable laws and reward performance. Eastman complies with all child labor laws and supports the elimination of unlawful child labor and exploitation.

We expect the same ethical conduct from our business partners.



Working Hours and Compensation

Our Company meets its obligations to us by providing proper working hours and wages including overtime pay consistent with local law. This includes equal compensation for work of equal value, without distinction based on gender.



Make business decisions based on merit.”

In our business activities, we each have a duty to act in Eastman's best interests. We disclose any potential conflicts of interest, allowing our Company to evaluate these issues.

What Is a Conflict of Interest?

A *conflict of interest* arises when your personal interests or activities influence, or appear to influence, your ability to act in the best interests of Eastman. Our policy requires that a Conflict Waiver be submitted to Global Business Conduct for all conflicts of interest or potential conflicts. The following sections explain some of the more common types of conflicts.

Personal Interests with Customers and Business Partners

We may not benefit, or seek to benefit, as individuals from the relationships that Eastman has with its customers or business partners, including suppliers, vendors, contractors, agents, or distributors. Team members must be free from the influence of personal considerations when making recommendations or decisions.

Employment Outside of Eastman

Eastman does not wish to interfere with our activities outside of work hours where no conflict exists. We may engage in other business activities, provided:

- Eastman's relationships with its customers or business partners are not adversely affected.
- No provision of any Employee Agreement is violated.
- Safety, wellness, performance, and attendance are not adversely affected.
- Work time is not used to conduct outside business activity.
- Eastman personnel, property (including IT systems and telephones), materials, supplies, or equipment are not used for outside business activities or for personal gain.

We may not work for suppliers or consultants related to Eastman's field of interest, customers, or competitors without prior written approval from Global Business Conduct.

Q Last year, Dennis and a team from Eastman collaborated with engineers from another company on a big project. They were impressed by his expertise, and the other company has now offered Dennis a part-time consulting position. Dennis would like to accept—but what should he consider first?

A Working for both Eastman and a company that does business with or competes with Eastman is likely to create a conflict of interest for Dennis. Before accepting the job offer, he should discuss his situation with his management, submit a waiver request form to Global Business Conduct, and obtain approvals.



***We ask
what if and
refuse to settle
for obvious
solutions.***

Financial Interests in Other Organizations

We must ensure that our personal investments do not put us in competition with Eastman. As Eastman employees, none of us may have a significant investment or other financial interest in the business of a customer, a supplier, a competitor, an agent or distributor, or an actual or potential participant in a transaction or other business venture involving Eastman. This restriction also applies to members of our households and our close personal acquaintances. Relatively small investments in the securities of publicly owned corporations would not normally be considered a violation.

Similarly, we may not own or work for a business that provides services to Eastman—unless we receive prior written approval through a Conflict of Interest Waiver from Global Business Conduct. Again, this also applies to members of our households and our close personal acquaintances.

None of us may authorize, execute, or approve any transaction in which we have a direct or indirect conflict of interest. If you have a conflict of this type, contact Global Business Conduct for guidance.

Serving on Boards of Other Companies

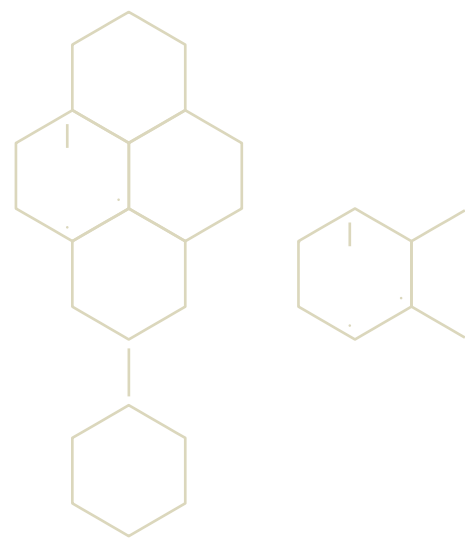
We must also refrain from serving in any capacity—including as a director, officer, partner, consultant, employee, distributor, or agent—for companies that compete or do business with Eastman, unless the relationship is disclosed and approved in advance by Global Business Conduct. Under certain circumstances, approval will also be needed from an Executive Team member. Positively impacting your community by serving on a board of directors for a charitable organization or professional association is encouraged and does not require prior approval. However, you should only accept a position if it does not interfere with your ability to perform your job.

Team Member Personal Relationships

Consensual personal relationships (that is, emotional or sexual relationships) between team members outside of working hours and off Company property generally fall outside Company policy. However, Company policy prohibits:

- Relationships that become a disruption in the workplace
- A manager engaging in a relationship with anyone in his or her line of supervision
- A manager supervising a family member or someone living in his or her household
- Relationships in which one team member can influence another team member's employment or termination decisions, job benefits or pay, assignments, promotions, performance reviews, discipline or any other employment term or condition

A conflict of interest can also arise if a member of your household or a close personal acquaintance owns or works for a company that is one of Eastman's suppliers, customers, or competitors. If you find yourself in that situation, you must not use your position to influence the bidding process or negotiation in any way. If you are directly involved in supplier selection or approval of invoices, notify management immediately and remove yourself from the decision-making process.



did you know?

A "close personal acquaintance" includes any individual with whom you share a close personal relationship and from whom you could benefit financially either directly or indirectly, immediately or at some time in the future. Examples may include members of your extended family, individuals with whom you share a cultural closeness such as godparents, lifelong friends, or others living within that person's household.

Q Tomas wants to ask Lydia out on a date, but they both work in procurement. Is it a violation of company policy to date a coworker?

A There is no problem as long as the relationship is on Tomas and Lydia's personal time and off of Company property. However, the Company will become involved if the relationship causes a disruption in the workplace, there is a direct reporting line between the parties, or one employee has influence over the other's benefits, pay, assignments, promotions, performance reviews, discipline, or any other employment conditions. If Lydia declines the invitation, Tomas should not ask again, as repeated requests could be viewed as sexual harassment. Team members should always use good judgment when considering personal relationships at work.

Don't let gifts influence good business."

We recognize that the exchange of small courtesies with our business partners develops and strengthens relationships—but we never give or receive gifts or entertainment that inappropriately influences business decisions or that conflict with our values.

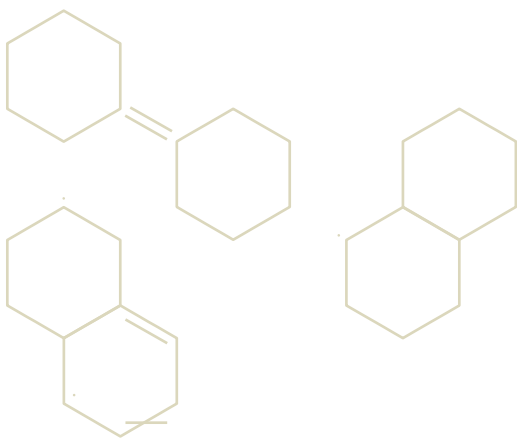
Giving or Receiving Gifts, Entertainment, or Travel

Exchanging gifts and entertainment can help build goodwill in business relationships. In many countries where we operate, these practices are an integral part of doing business. However, some entertainment or gifts can make it difficult for us to remain objective about the person or company we are dealing with. When interacting with business associates, we must be careful when offering, giving, or receiving gifts, providing meals or entertainment, and paying for travel. We should do so only if the item is of reasonable value, complies with the recipient's own laws and corporate policies, and is not given with any corrupt intent to improperly influence business decisions. Additionally, giving gifts and entertainment should not occur on a frequent basis.



Any gifts or entertainment provided to a third party must be properly reflected in our Company's books and records.

We are not permitted to provide or receive gifts or entertainment with the intent to inappropriately influence or induce business. In fact, such practices are not only against Company policy, but also may violate anti-corruption laws (see [Business Partners](#)). This is true regardless of whether we are giving or receiving. These situations can arise through interactions with suppliers, customers, or other business contacts. Any third party conducting business on Eastman's behalf must also follow these principles.



Exchanging gifts and entertainment can help build goodwill in business relationships. However, some entertainment or gifts can make it difficult for us to remain objective about the person or company we are dealing with.



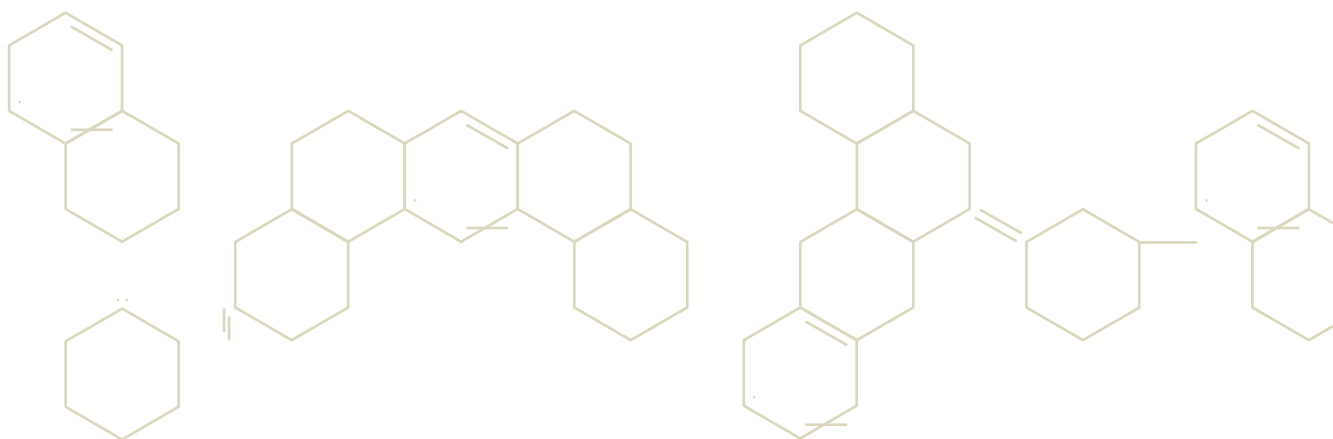
Gifts

A *gift* is any item of value given to or received from someone who is not an employee of Eastman. Some examples could include personal presents, gift baskets, tickets to sporting events or concerts (not attended by the giver), travel, use of a vacation home, gift cards, cash, prizes awarded in a vendor drawing, jewelry, equipment, or artwork.

Certain types of gifts—because of their nominal value and their nature—fall within the limits of reasonableness and are permitted to be offered or accepted without prior authorization, provided there is a justifiable business purpose, they do not include cash or cash equivalents, and are given on an infrequent basis. These gifts often include items with a company logo such as pens, shirts or backpacks, or a modest holiday gift like a gift basket.

The giving or receiving of gifts of greater than nominal value is generally not appropriate but may be acceptable in some situations with the proper approval. Please refer to the Travel and Entertainment Policy and the applicable regional policy for more information regarding the appropriate level of approval required and for additional details.

Keep in mind that we and our family members may accept discounts on personal purchases of a supplier's or customer's products only if such discounts are offered to all other Company employees.



Entertainment

Entertainment is a situation such as meal or event outside the workplace where both a representative from the giver and recipient are present.

Providing or accepting entertainment may be allowed under the following:

- The purpose is to hold bona fide business discussions or to foster better business relations,
- It is consistent with acceptable business customs and practices,
- It is not illegal or in violation of the other party's ethical guidelines,
- It is of reasonable value and would be paid by normal expense account procedures,
- It is not solicited by the recipient,
- It cannot be construed as a bribe, payoff, or kickback,
- It is not provided or accepted on a repeated basis,
- It will not cause, or be perceived to cause, the recipient to alter normal business judgment concerning any transaction with the Company, and
- It will not be an embarrassment to the Company or the employee if publicly disclosed.



Some regions and business units have internal guidelines and policies that are more restrictive than those outlined above or require certain levels of approval for accepting or providing gifts or entertainment. In these situations, you must follow the applicable guidelines.

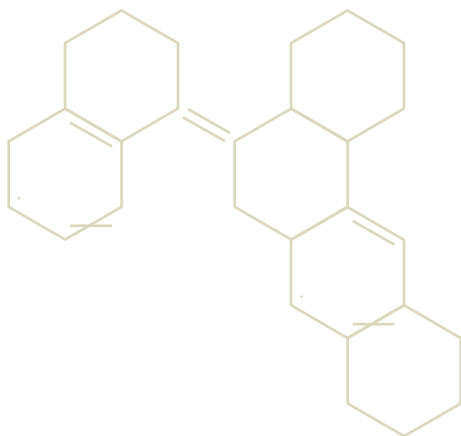
did you know?

If the person providing the meal, tickets, or entertainment is not attending the event, it is considered a “gift” —and it must meet Eastman's guidelines for appropriate gifts. Always follow all policies and guidelines that apply to you when giving and accepting entertainment.

Travel

From time to time, there may be a justifiable business purpose for us to provide business travel for a third party or receive business travel from a third party. Any such travel is subject to special rules. You must obtain prior written approval from your Vice President and Global Business Conduct.

On occasion, the Company may reimburse travel-related expenses of a spouse, family member, or other significant other when it is appropriate for legitimate business purposes. These reimbursements are subject to special rules, and you must provide written approval of your Vice President describing the business purpose along with the request for expense reimbursement.



Special Circumstances

In situations where Company policies would not normally permit you to accept a specific gift, but local custom would make refusing the gift awkward or insulting, you may accept the gift on behalf of the Company, if lawful. In this situation, immediately consult with management and Global Business Conduct about the appropriate disposition of the gift.

If you are ever unsure of whether a gift, entertainment, or travel is acceptable, contact Global Business Conduct for guidance.

Q Kendra wants to purchase gifts for several government employees and is considering paying for them with her own funds to avoid a potential policy violation. Is this okay?

A No, regardless of who pays for the gift, it would still be considered a gift from Eastman. To prevent any violations of the law or company policy, Kendra should contact Global Business Conduct before purchasing or giving gifts to any government employee.

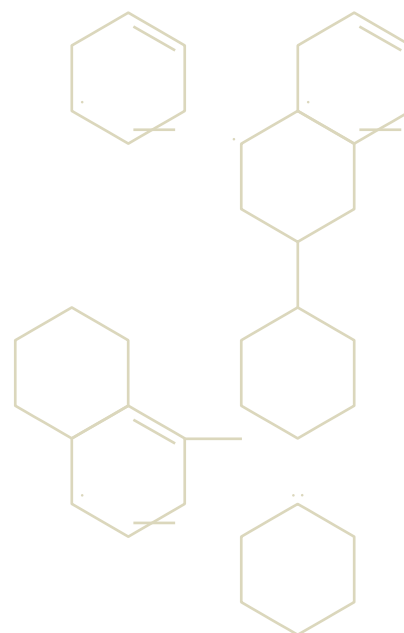
Inappropriate Gifts and Entertainment

Any form of gift or entertainment that could reasonably be expected to negatively impact the Company's reputation is prohibited. You should avoid excessive alcohol consumption when you are in social situations with business partners. Do not provide or accept entertainment at adult entertainment venues (including gentleman's clubs, any establishment with scantily dressed or nude performers, or any establishment offering services of prostitutes or sexually-oriented entertainment) or paid sexual favors while on Company business, even if any expense is paid with personal funds.

Government Officials

Special restrictions apply when dealing with governments or representatives of state-owned businesses. Consult with Global Business Conduct to determine whether there are any special restrictions before engaging in a business relationship with any government or government-owned entity. Under no circumstances should any gifts, entertainment, meals, transportation, lodging, or other things of value be given to any government employee without prior, specific approval from Global Business Conduct.

We are not permitted to provide or receive gifts or entertainment with the intent to inappropriately influence or induce business.



*We don't tell
your secrets.
So don't
tell ours."*

Our proprietary information enables us to compete, innovate and grow. We must protect this valuable resource from loss, theft, or misuse.

Protection of Company Information

Information is one of Eastman's most valuable assets. Company information should only be used for approved Company purposes and appropriate approvals must be obtained before you disclose information outside the Company. To the extent allowed by law, Eastman reserves the right to monitor the use of Company information at any time, including monitoring the corporate information technology network.



Trade secrets

Trade secrets can be defined as information that gives someone an economic advantage and is not generally known. A trade secret can last indefinitely if properly protected. For these reasons, protecting Eastman's trade secrets remains a high priority.

There are many types of trade secrets within Eastman. Some examples include:

- Technical information such as process operating conditions, product compositions, plant capacity, operating procedures, production equipment, and analytical methods
- Business information such as customer lists, pricing, business strategies, Research & Development projects, and market studies

All of this information is proprietary to Eastman and must not be disclosed outside the Company. Even within Eastman, this information should be shared only with individuals who need it to do their job. This also applies to any confidential information supplied to Eastman by third parties. Our responsibility to protect Eastman trade secrets and other proprietary information may extend beyond our term of employment.

Intellectual property

Our creativity and innovative ideas significantly contribute to our Company's continued success in the marketplace. Company assets such as trademarks, copyrights, patents, and inventions are the products of many years of hard work.

- Trademarks protect the names and logos of our Company and our products. They may only be used with proper permissions and with appropriate quality control over the product bearing the mark.
- Copyrights protect works such as technical papers, articles, photographs, and software. We are committed to protecting the copyrights of others just as we expect Eastman's copyrights to be respected.
- Patents protect new products, processes, and equipment. All new products and processes must be cleared by the Law Department to ensure that our commercial use will not infringe on existing patents that do not belong to Eastman.

Like other Company property, these assets may not be used for our own personal purposes. Further, like all Company information, we are responsible for protecting the confidentiality of this information.

did you know?

We have a responsibility to protect all forms of Company information and use them only for business purposes. Never use this information for your own purposes or share it with anyone who does not need to know it.

Q *Vanessa played a crucial role in developing a new product that will go into production in a few weeks. A close friend who used to work on her team at Eastman—but now works for a competitor—asks how she figured out a technical problem that they had been working on together. Vanessa is very proud of how she solved the problem and is eager to explain—but should she?*

A *No. This technical information must be treated as confidential Company information. Now that her friend works for a competitor, Vanessa must not share this technical information. Disclosing proprietary technical information about the new product would likely compromise our competitive advantage.*

Inventions

Eastman's future growth depends in part on the success of our innovation efforts. Remember, any invention or other intellectual property you create while employed by Eastman that relates to Eastman's existing or contemplated business is the exclusive property of Eastman.

Confidential Information Provided by Other Companies

Eastman's policy is not to accept information that could be deemed confidential, restricted, or limited in its disclosure or use, unless a written agreement specifying the rights and obligations of all parties has been approved by Eastman's Law Department and signed by an authorized representative of each party.

A properly executed agreement ensures that Eastman's business, research, development, and technical services are not compromised. Such an agreement can also prevent other parties from claiming an unwanted confidential relationship.

Until such an agreement is in place, you should refuse to discuss or accept the confidential information of others. Examples of such confidential information could include:

- Unsolicited disclosures by outside inventors
- Drawings and manuals that bear markings asserting confidentiality
- Proprietary designs, processes, methods, systems, procedures, or formulas
- Confidential financial information or business planning documents



Information about Other Companies

Eastman will not use any illegal or unethical act to obtain another company's trade secrets or other confidential information. All forms of industrial espionage are prohibited. We must never expect team members who formerly worked for a competitor to reveal that company's confidential information.

Insider Trading

Confidential Company information should never be used for personal gain. We may never buy or sell stock in a company while in possession of material nonpublic (inside) information about that company. This is true for Eastman stock, as well as stock or other securities of suppliers, customers, competitors, venture partners, acquisition candidates, or other companies.

Information is considered *material* if a reasonable investor would consider it important in deciding whether to purchase, sell, or retain a security. Information is *nonpublic* if it has not been made generally available to investors (by means of a press release, for example). Information that fits both descriptions is considered *inside information*.

Examples of inside information include:

- plans for mergers or significant acquisitions
- earnings and financial results prior to release
- news of major changes in senior management or organizational structure
- threatened litigation or changes in the status of an ongoing lawsuit
- gain or loss of important contracts or customers
- planned action regarding our stock
- product developments or discontinuations

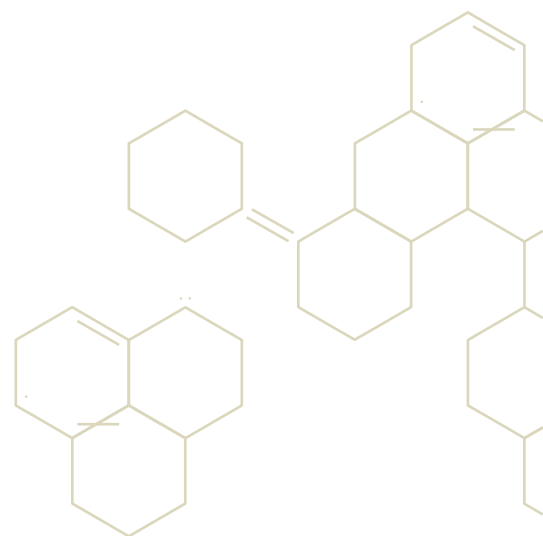
In addition, if you possess inside information, you must not communicate, or *tip*, that information to family, friends, or others who may trade (or advise others to trade) in Eastman or other Company's stock.

In addition to the restrictions indicated above, further restrictions apply to Eastman's officers and directors. Contact the Law Department if you have questions about trading stock.

External Communications and Requests

To ensure our Company speaks with one consistent voice, only authorized personnel may speak as an Eastman representative. Similarly, only people authorized by the Chief Financial Officer or Investor Relations may speak on behalf of Eastman to members of the financial community, such as securities analysts, stockholders, or fund managers.

All marketing communications must follow the review and approval processes established by Marketing Communications. This includes marketing communications on the Company's web site, social networking outlets, and e-marketing campaigns such as search engine optimization, videos, banner ads, and webinars. These processes help ensure that Company communications are appropriately grounded in established standards of scientific inquiry and do not mislead stakeholders or inadvertently disparage competing products.



Social Media

The importance of consistent, accurate communication also applies to social media. Unless you have been trained and approved as a Company spokesperson, you should not speak on Eastman's behalf in any social media arena.

- When you discuss Eastman or non-confidential Eastman-related matters, such as Eastman products or services, make it clear that you are speaking for yourself and not on behalf of Eastman.
- Be careful to never disclose confidential Eastman information on social media.
- Do be aware of your association with Eastman in online social networks. If you identify yourself as an Eastman team member, ensure your profile and related content are consistent with how you wish to present yourself to colleagues and our stakeholders. Eastman's brand is best represented by its team members—so what you publish may reflect on Eastman's brand.
- Always clearly identify yourself as an Eastman team member before starting social media discussions or comments relating to Eastman, Eastman's competitors or business partners. Never talk negatively on social media about competitors' products or services.

Integrity is precisely what we're about."

We are accountable for providing our stakeholders with a reliable representation of Eastman's performance. We are each responsible for the integrity, completeness, and accuracy of the Company records that we prepare or maintain.

Accurate Books and Records

Company records must be true, accurate, and complete. Records could include accounting records, expense statements, financial and research reports, and time records. Improper or fraudulent accounting, documentation, or financial reporting violate Company policy and may also violate applicable laws, including anti-bribery statutes.

Fraud

Keeping accurate records also helps us prevent and detect fraud. Fraud generally involves taking something you are not entitled to, or lying to receive something of benefit for yourself. It is prohibited, both within our Company and in all external dealings.

Fraud specifically includes:

- Theft of Company property
- Forgery
- Misappropriation of funds, securities, supplies, or any other Company asset
- Irregularities involving money transactions
- Falsification of expense statements, time records or any other Company record
- Improper financial reporting or recording fictitious or misleading transactions in financial records
- Bribery
- Tax evasion

Fraud also includes any irregularity or suspicion of any irregularity involving vendors, customers, Company personnel, agencies, unknown parties, or Company property.

did you know?

Fraud may include intentionally concealing facts in order to deceive or mislead others. Eastman's reputation depends on the integrity of our actions and our records. To maintain our reputation, we are committed to preventing and detecting fraud.

Q Manuel and his colleague, Carla, are trying to close a large deal. As negotiations come to a close, he accidentally receives an email that makes it clear that Carla and their point of contact at the other company had a secret agreement. The other company would place a larger order than they wanted, which would increase Carla's sales commission substantially. Then the company would return what they didn't need. What should Manuel do?

A Carla's plan is a form of fraud—and now that he knows about it, Manuel should report what he knows to a member of management or Global Business Conduct. We are all responsible for making sure that Eastman's records are accurate, complete, and honest.

Records Management

All Company records, in physical or electronic form, must be retained in accordance with Eastman's Record Management guidelines and applicable legal requirements.

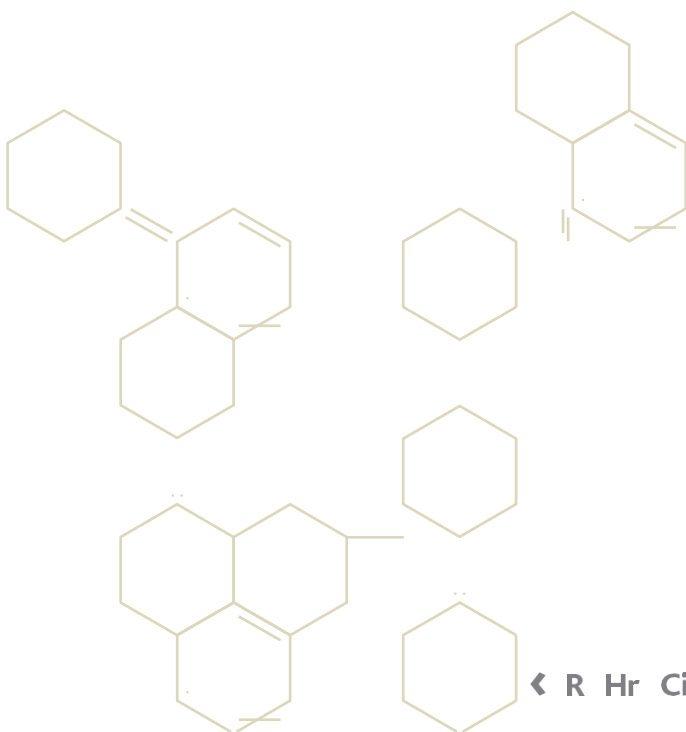
The Company's Legal Hold process is an integral part of Eastman's Records Management Program. Whenever documents will be required in connection with a government investigation, or threatened or actual litigation, the Law Department will direct you to retain and preserve potential relevant records.



No Improper Influence on Audits

We each have an obligation to cooperate with any internal audits or external audits conducted by our Company's external audit firm. In these situations, always tell the truth and comply with any requests for information. We should never directly or indirectly take any action to manipulate or mislead any auditor in the performance of an audit.

We are often also subject to audit requests from customers or other parties. Contact your management or the Law Department if you have questions regarding the Company's obligations for this type of audit.



Good partners make for good business.”

We will conduct business only with third parties who share our commitment to complying with legal requirements and maintaining high ethical standards. We expect our business partners to act with integrity, honesty, and transparency.

Payments for Products and Services

We are committed to sound business practices in all of our relationships with customers, suppliers, and other business associates. In all situations, we must exercise good judgment to avoid the appearance of inappropriate conduct.

Sales-related commissions, rebates, discounts, credits, and allowances are customary business payments. However, we must be sure to avoid illegal or unethical payments, and must comply with applicable currency exchange controls and regulations. Payments that our Company makes or receives should be:

- Reasonable in value, relative to the goods or services provided and to industry norms.
- Properly documented in agreements reviewed and approved by the Law Department. The documentation should clearly define the nature and purpose of the transaction.
- Payable to the appropriate business entity, not its individual officers, employees, or agents, and not payable to another business entity. The payment terms, payment method, and process for sending the payment should be defined in the agreement.
- Charged to the business entity or product benefiting from the payment. The company should provide full visibility regarding any payments and should not charge the payment to a non-related account.



Working together, both internally and externally, we achieve more.

Payments and Gifts to Government Officials

At Eastman, our policy is to comply with all applicable laws and regulations regarding payments or gifts made to government officials or representatives of state-owned businesses. We will not offer, authorize, or make any illegal payments or provide gifts or favors to influence a government official to use his or her position to obtain or retain business for the Company. Both the offer and actual payment of anything of value is illegal. Payments to third parties are strictly prohibited if you know or should have known that the third party will make an illegal payment to a government official.

did you know?

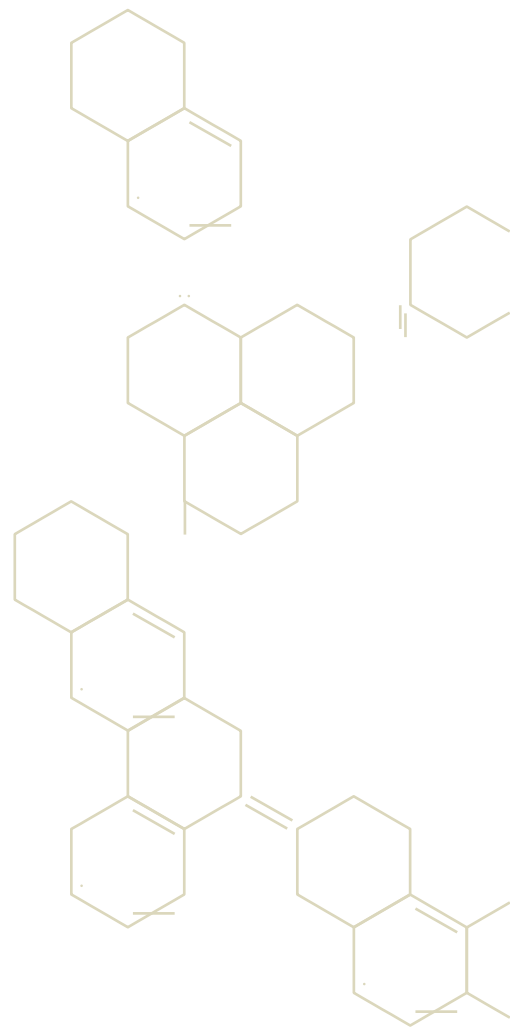
A government official is any federal, state, or local government employees (including legislators), political candidates, and even employees of businesses that are partly or wholly owned by a foreign government.

Anti-Corruption

Eastman sells and purchases products and services on the merits of competitive pricing, quality of work and materials, and timely performance. This means we never give, offer, or accept improper payments in any form.

Many countries in which we do business have laws that strictly prohibit giving, receiving, offering, or soliciting bribes, kickbacks, and other improper payments. A *bribe* is anything of value or an improper favor given or offered in an attempt to influence an individual's actions or decisions. These actions or decisions could take the form of helping Eastman obtain or retain business or acquire any sort of improper advantage. For example, the advantage might be providing information that is normally unavailable or allowing Eastman to submit a late bid or proposal.

A *kickback* is a commonly used form of negotiated bribery by which the bribe-giver pays a commission to the bribe-receiver as a *quid pro quo* for services rendered. This often happens through fraudulent or inflated invoices, so that the bribe-giver in return receives a piece of the paid amount



Q *Mei has been tasked with increasing Eastman's market share in a country that has particularly strict import regulations. She discusses the challenge with colleagues who have experience in the region. One of them points out that the officials she'll be working with may expect bribes, and another jokes that at least bribery would be a way of getting around tough customs inspections. What can Mei do to establish good relationships without compromising her or Eastman's integrity?*

A *Mei must be polite but firm in any dealings with government officials, making it clear that while she respects their rules and processes, Eastman will not be involved in any kind of bribery or other corrupt arrangement. She could look for partners and allies in the region who share Eastman's values and commitment to integrity. Mei should also keep in mind that the best way to handle tough customs inspections is to be meticulous in following the appropriate rules and regulations.*

Facilitating or expediting payments

When working with government officials, we must never agree to pay facilitating payments, even if we are working in areas where they may be a common practice. *Facilitating or expediting payments*, which are generally small payments made directly to a government official to secure timely performance of routine governmental actions that the Company is entitled to under local law, are not permitted. Such actions include obtaining permits and licenses, processing visas and work permits, mail pickup and delivery, and providing telephone and water service and supply. Payments made directly to a government agency according to a publicly available schedule of fees are allowed. Any such payments must be recorded as a business expense in the Company's books and records.

Any questions about the legality of any contemplated gift or payment to an official or elected representative should be directed to the Law Department or Global Business Conduct.

We must never agree to pay facilitating payments, even if we are working in areas where they may be a common practice

*Play fair.
Compete
lawfully and
ethically.”*

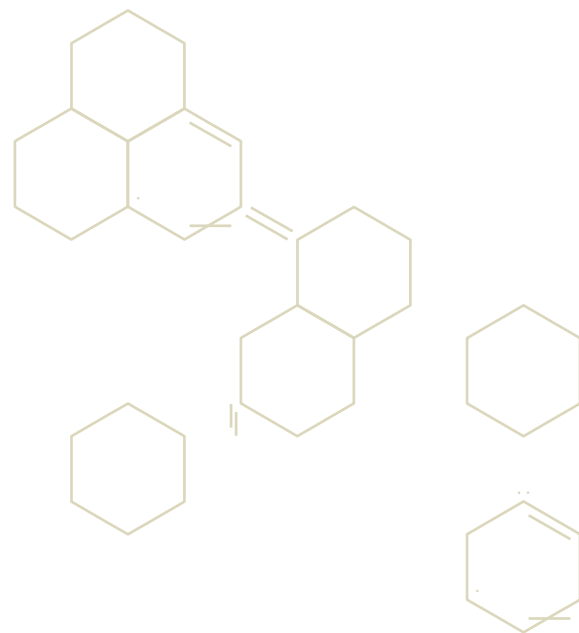
Our goal is truth in all relationships. Our actions match our words. We do the right thing at all times.

Fair Dealing

We endeavor to deal fairly with our customers, suppliers, competitors, and each other. We never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice. Eastman does not promote its business by disparaging its competitors, their products, or their services.

Truthfully Market, Promote, and Advertise Our Products

We market, promote, and advertise our products in a fair, truthful, and ethical manner. We will never misstate the facts or mislead customers in our advertisements, labeling, packaging, or promotions.



Q Joan recently attended an industry trade show. While there, she met up with Kim, a friend who works for a competitor. During lunch, Kim implied that if Joan could get Eastman to charge more for their product, she'd make sure her company would charge the same price for a similar product. How should Joan respond?

A Joan should tell her friend that this isn't a proper business discussion, excuse herself from the meal, and promptly report the conversation to the Law Department or Global Business Conduct. Price fixing violates antitrust and competition laws and can carry severe consequences for both the individuals involved and the Company.

We *manage* risks and move forward by *developing plans* with options.

Competition Law / Antitrust Law

Because Eastman is committed to competing based on the quality of our products and services, we will never engage in or support unfair or predatory business practices or any activities that would improperly restrain trade. It is also critical that we avoid any activity that could violate or give the appearance of violating competition laws.

did you know?

Competition laws are designed to encourage competition in business for the benefit of the consumer. It is Eastman's policy to comply fully with all applicable competition laws.

In all contact with competitors, avoid any conduct that suggests an understanding or agreement exists with respect to prices, terms of sale, production for third parties, or allocation of customers, markets, or territories. To this end, avoid any discussion or communication with any representative of a competitor concerning the following:

- Prices
- Pricing policies
- Bids
- Discounts, rebates, royalties, or promotions
- Credit or shipment terms, or other conditions of sale
- Choice of customers or allocating customers between competitors
- Dividing up a territory between competitors
- Products to be manufactured or sold production quantities or quotas (that is, agreements between competitors as to the amount of products to be manufactured and/or sold by each or the addition of new capacity)
- Employee compensation practices



The following are practical suggestions:

- If a competitor invites you to discuss pricing or other prohibited subjects, terminate the discussion immediately and report it to the Law Department, Global Business Conduct, or management.
- Do not exchange price lists, bids, terms, or conditions of sale with a competitor, except in connection with a bona fide sale to, or purchase from, that competitor.
- Do not ask someone to determine what competitors will do in response to a proposed price move if obtaining an answer would involve contacting a competitor. Do not do anything indirectly that would be a violation of law if done directly. “Signaling” price moves among competitors can be tantamount to an agreement on prices.
- Refrain from discussing pricing or other matters detailed above during any acquisition, divestiture, or joint venture negotiation or other legitimate contact with our competitors without approval from the Law Department.



Q Ben is representing Eastman at a trade show, something he often does. Over a drink with his friend Kent, who works for a competitor, Kent brings up work and begins to ask about Eastman's sales and revenue. Ben tries to be polite and answer with only publicly available information. Kent then goes further and says, “You know, if we coordinate a little on prices, we could dominate this industry. It would put both our careers on the fast track.” How should Ben respond?

- | | |
|--|---|
| ☐ “You know, I was hoping I’d be promoted more quickly than I have been. I’m not saying yes, but what did you have in mind?” | ☐ “I can think of just the product to start with, too.” |
| ☐ “Kent, you know that’s illegal. I’m not interested, and I absolutely won’t participate.” | ☐ “Kent, you know that’s illegal. Let’s go get dinner somewhere we can talk more freely.” |

Benchmarking and information exchanges

Benchmarking is a structured approach for exchanging and analyzing information. Before we exchange information with a competitor or benchmark ourselves against them—whether directly or through a third party or consultant—we must determine whether there are competition concerns. This is because such exchanges could include information about prices and terms of sales, credit practices, costs, productions levels, future plans, and compensation, which could violate antitrust laws. Accordingly, any such benchmarking or information exchanges must be approved in advance by the Law Department.

Trade and credit associations and industry groups

Trade and credit associations and industry groups typically involve meetings of competitors. These groups should arrange for legal counsel to be present at all meetings to ensure compliance with competition laws. Request written approval from the Law Department before applying for membership in one of these organizations. Be aware of antitrust related topics and activities. Never talk with other members about your business's current or future prices or marketing efforts. When the conversation strays into commercially sensitive topics, make other members aware and pull the discussion back on track. If that does not help, leave the meeting and make sure that your concerns have been clearly documented in the minutes.

Reciprocal dealing

Eastman's decision to buy goods and services from a supplier must be made independently from the supplier's decision to purchase Eastman products or services.

Eastman is committed to competing based on the quality of our products and services; we will never engage in or support unfair or predatory business practices

Export Control

Many governments have laws and regulations that govern the export of products and technical data from one country to another. Eastman's policy is to comply with all applicable export regulations worldwide.

Exporting technical data can take place in several ways:

- Disclosing technical information to an employee of one of our non-U.S. subsidiaries
- Disclosing technical information to a non-U.S. citizen, including Eastman team members or consultants who do not have a green card
- Providing information to non-U.S. companies or individuals

Because the export laws and regulations are constantly changing, any disclosure involving a non-U.S. person or entity must be reviewed prior to the disclosure. For questions regarding the proposed export of products or technical data, review the matter with the organization's export compliance representative, Global Business Conduct, or the Law Department.



Sanctions, Embargoes, and Anti-Terrorism

Company policy prohibits the use of Company assets or personnel to finance or otherwise aid terrorist groups or activities. Additionally, as a global company headquartered in the U.S., we are subject to U.S. and other global laws relating to sanctions and embargoes. These laws also prohibit transactions with terrorists and narcotics traffickers and imports from designated foreign persons who promote the proliferation of weapons of mass destruction. Any proposed dealing with a country or entity subject to these sanctions or embargoes must be reviewed by the Law Department to determine whether the proposed conduct is allowable under the law. This also applies to deals made indirectly through third party business partners.

Money Laundering

Money laundering is attempting to disguise the origins of money obtained through illegal activities to make it appear as if the money was obtained from legal sources. Eastman will comply with all laws regarding the prohibition of money laundering. Prior review and approval from our treasurer is required for any questionable financial transactions involving transfers of cash or cash equivalents.

Anti-Boycott

Eastman will not participate in or support economic boycotts that are not sanctioned by the U.S. government. As a global company, we must take care that nothing we do or say could be seen as participating in an illegal boycott. For example, we may not certify that an entity is not blacklisted, or provide information on a company's activities with a boycotted entity.

Boycott-related requests are often received orally or in the form of a contract bid, purchase order, insurance verification, letter of credit, shipping document, or joint venture or alliance negotiations. Any request to participate in or support an illegal economic boycott must be reported to the government. Failure to do so is a violation of U.S. law. These laws apply to Eastman's operations inside and outside the United States. Any boycott request should be forwarded to the Law Department.



Individual Political Activities

Eastman encourages our personal participation in political activities. However, these activities should be limited to your own time and resources. We should never expect to be reimbursed for any political contributions without specific, prior approval from Eastman's Government Affairs organization and the Law Department.

If you wish to seek public office, be aware of applicable Company policies and discuss the matter with Eastman's Government Affairs organization, your management or a Human Resources Representative. Remember, Eastman's name, information, property, time, or other resources may not be used for political activities unless they have been specifically approved by Eastman's Government Affairs organization. This can prevent any conflict of interest, and ensures that we comply with all applicable laws.

Corporate Political Activities

Any contribution our Company makes to a political party in any country must be done lawfully. Any political contributions made by Eastman or on its behalf in the United States must have the express authorization of the Eastman PAC Advisory Council. Political donations made in any other country must have the express authorization of Eastman's Government Affairs organization, the Law Department, and Global Business Conduct.

Charitable Giving and Donations

Eastman fully supports charitable giving to approved organizations as a way to support our communities and Company philanthropic objectives. However, when the charitable organization has links to a foreign government, for instance through ownership, specific care must be taken to ensure against allegations of bribery or corruption. For that reason, donations Eastman makes outside the United States always need prior approval from Global Business Conduct. Donations in the United States must have the prior approval of the Global Public Affairs and Policy organization or the Eastman Chemical Company Foundation. Eastman donations must be properly recorded. Of course, we can each make personal donations to charitable organizations, but not on behalf of the Company.



Government Contracting

There are complex regulations that apply to government contracts. These regulations have restrictions that can be significantly different from those that apply to our contracts with private commercial entities. Government procurement regulations cover pricing, cost accounting, quality control and testing, paying gratuities and kickbacks to government employees, hiring or retaining former government employees, and the confidentiality of government information. Seek advice from the Law Department when evaluating government contracting.

Protect yourself and the environment.”

We are good stewards of our company, environment and world, ensuring success today and for future generations. We believe all work related injuries are preventable. We watch out for each other and practice injury-free habits at home and at work.

Providing a Safe and Healthy Workplace

Each of us needs to have a working knowledge of the Health Safety Environment and Security laws, regulations, and Company policies that apply to our area of responsibility. We should also be aware of the resources that are available in the Company to help us comply with these rules.

Responsible Care® is the global chemical industry's initiative developed to respond to public concerns about the manufacture and use of chemicals. Through Responsible Care®, Eastman and other member companies agree to support a continuing effort to improve the industry's responsible management of chemicals. Responsible Care® Principles are reflected in Eastman's Corporate Guiding HSES Policy.



Safety

We are all in for safety.

- Follow Procedures and Safety Rules
- Take Time To Do The Job Safely
- Use Personal Protective Equipment (PPE)
- Identify and Eliminate Hazards
- Watch Out for Co-Workers
- Report All Job-Related Injuries or Illnesses



Team Member Wellness

We make personal choices to promote a healthy lifestyle that includes appropriate work-life balance.

Impairing substances

At Eastman, we must be free of impairment due to alcohol or drugs upon reporting to work and during all work time. To that end, we may not use or possess illegal drugs on Company property or while on Company business. This prohibition includes prescribed or over-the-counter drugs that are not being used as prescribed or intended.

Alcohol: Unauthorized possession or use of alcohol on Company property is prohibited. Use of alcohol off premises while on Company business is also prohibited if it results in:

- Impairment of the team member's business judgment or job performance
- Placing anyone's safety at risk.

Drugs: The possession, use, sale, manufacture or distribution of illegal drugs, and the abuse, misuse, or sale of prescription drugs, is also not allowed.

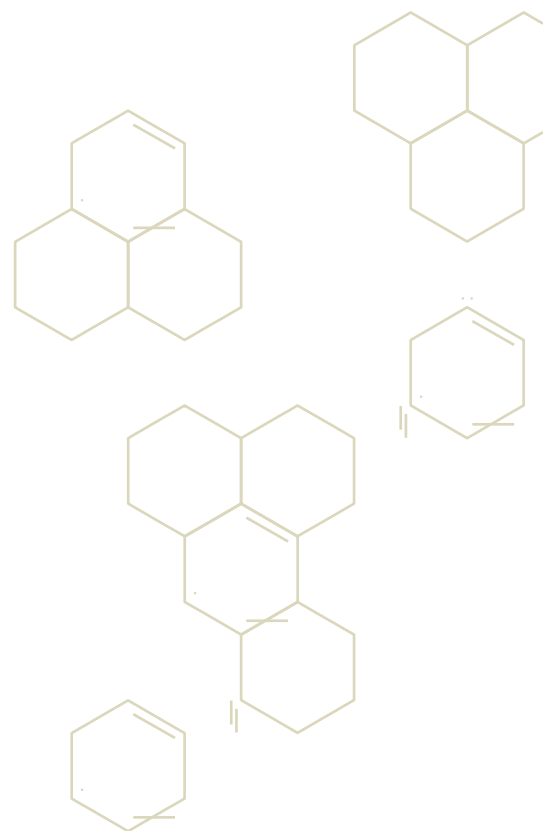
Driving under the influence

While driving a Company vehicle and/or while on Company business, in addition to following all traffic rules, we must never drive under the influence of alcohol or drugs.

Eastman considers you too impaired to drive if you either

- have a blood alcohol level over 0.08 or the local legal requirement (whichever is lower), or
- are under the influence of illegal or prescription drugs and are unable to safely operate the vehicle

If you are cited for an alcohol-related traffic violation while driving an Eastman-owned or leased vehicle (including rental cars), you must report the incident to management. If you regularly use an Eastman-leased vehicle for your job (sales, for example), you must report any alcohol-related traffic citations, even if you were driving a different vehicle at the time.





Workplace violence

Eastman will not tolerate violence in the workplace in any form. Examples of workplace violence include physical assault, threat of physical harm or assault, stalking, and intimidation. If you know of or suspect incidents or threats of workplace violence, you must immediately report your concerns. If you believe someone is in immediate danger, contact plant protection or corporate security.

Weapons

Firearms and other weapons are strictly prohibited on Company property (unless expressly permitted by local law). Company property includes, but is not limited to Company-owned or controlled land—both developed and undeveloped—as well as Company buildings, parking lots, and vehicles. Temporary possession of a weapon on company property can be authorized by senior management for security personnel or a trained team member when it is necessary to ensure safety and security.



We make personal choices to promote a healthy lifestyle that includes appropriate work-life balance.



Protecting the Environment

We understand that contributing to a healthy environment is beneficial for the communities in which we operate and for business. To that end, we should continually assess and improve our processes in order to protect the communities in which we live. In order to do this, we conduct periodic risk assessments to identify potential hazards and then take appropriate precautions to minimize these risks. In these assessments, we consider not only scientific and economic factors, but also societal factors to ensure we perform a proper evaluation.

We work to set a good example for the rest of our industry by striving to meet—or exceed—the environmental laws, regulations, and standards that apply to us, including Responsible Care® principles. Each of us has a responsibility to report any practice that is harmful to the environment or does not comply with our Company’s policies.

Q *While working in the plant, Steven witnessed a small chemical spill. Should he report it?*

A *Yes. Any spill should be reported, no matter how small. Steven should inform a member of management immediately so proper steps can be taken to address the spill and an investigation can be conducted in order to prevent it from happening again and to determine if Eastman is required to report the spill to external agencies.*

***We meet our
commitments.***

Developing the Sustainability of Our Products

We believe that the success of our business is based on balancing our commitments to the three pillars of sustainability: economic growth, environmental stewardship, and social responsibility. We make it a priority to manufacture our products in a way that safely minimizes our environmental footprint and our use of natural resources. We have also developed environmentally friendly products and technologies which not only drive Eastman’s financial growth but also bring considerable value to our customers and consumers worldwide.

Waivers

Our Code of Business Conduct applies equally to all of Eastman’s team members, officers, and directors. In the unlikely event that granting a waiver for any director or officer from any Code provision is in Eastman’s best interests, such a decision may only be made by the Board of Directors or its Audit Committee, and must be promptly disclosed as required by law. Only the Chief Compliance Officer or his designee may grant waivers to other Eastman team members.

Resources

Global Business Conduct Intranet Site

The Company maintains an ethics and compliance intranet site with additional information about the Code, policies and guidelines, training, and other ethics and compliance matters. The site can be accessed on the Company intranet at: <https://eastmanchem.sharepoint.com/sites/myeastman-global-business-conduct>

Policies, Standard Operating Procedures, and Guidelines

For further guidance on topics in this Code or for information on additional topics, refer to Eastman's policies, procedures, and guidelines. You should be familiar with all Corporate policies applicable to your job. Corporate policies, procedures, and guidelines are available on the intranet at: <http://myeastman/company/policies/Pages/CorporatePolicies.aspx>

Global Business Conduct

Global Business Conduct is available to answer any questions about the Code or Company compliance policies, or to discuss any concerns you may have about potential Code violations.

To contact the Global Business Conduct Office:

Call 1.423.229.5552
Email compliance@eastman.com
Mail Global Business Conduct
Eastman Chemical Company
PO Box 431
Kingsport, TN 37662

Eastman Business Conduct Helpline and Website

(Reports are confidential and may be made anonymously when permitted by law):

- Toll-free reporting from within the United States: Dial: 1.800.455.5622.
- If dialing internationally (outside the United States), visit the Eastman Business Conduct Website at www.reportaconcern.eastman.com and select your location from the dropdown list to get the international number assigned to your country.
- WEBSITE ACCESS: www.reportaconcern.eastman.com



Code of Business Conduct

EASTMAN

Global Business Conduct
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