Borealis AG Responses to Customer Inquiries

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1. General Information About Borealis

1.1 Scope and Purpose

The purpose of this document is to provide answers to frequently asked questions directed to Borealis from its customers in regards to the Borealis approach to Sustainability including (or with special focus on) Ethics and the Borealis' quality and environmental management systems.

Further information can be found on the company website under www.borealisgroup.com

1.2 General Information

Head office

Borealis AG
Trabrennstrasse 6-8
AT-1020 Vienna

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Fax +43 1 22 400 333
Mail to: Contact - Borealis (borealisgroup.com)

THOMAS GANGL
CEO

- Chairman of the Executive Board
- Human resources
- Communication
- Procurement
- Legal
- Strategy & Group Development

MARK TONKENS
CFO

- Business Support
  - Business Finance
  - IT & Services
  - Internal Audit
  - Business Intelligence
  - Group Tax
  - Treasury & Funding
  - Group Controlling
- Melamine & Fertilizer
- Group Quality, Programme & Project Management Office

LUCRÈCE FOUFOPOULOS
EVP Polyolefins & Innovation & Technology

- PO Marketing and Sales
- Commercial Excellence
- Innovation & Technology
- Borealis North America
- Borealis Brasil
- Business Optimisation & Supply Chain
- PO New Business Development

WOLFRAM KRENN
EVP Base Chemicals & Operations

- Base Chemicals
- Operations Polyolefins and Base Chemicals
- Groups HSE
- Technical Development & Engineering
- Plant Availability & Turn-Around
- Manufacturing Excellence and Improvement

PHILIPPE ROODHOOFT
EVP Middle East & Growth Projects

- Borouge JVs
- Growth Projects
- Technical Support
- Borealis ME Representative Office

Our Executive Board effective 1 May 2021

Further information on the shareholders of Borealis and its Executive Board Members can be found on the Corporate Website.

1.3 Business Activities and Applications

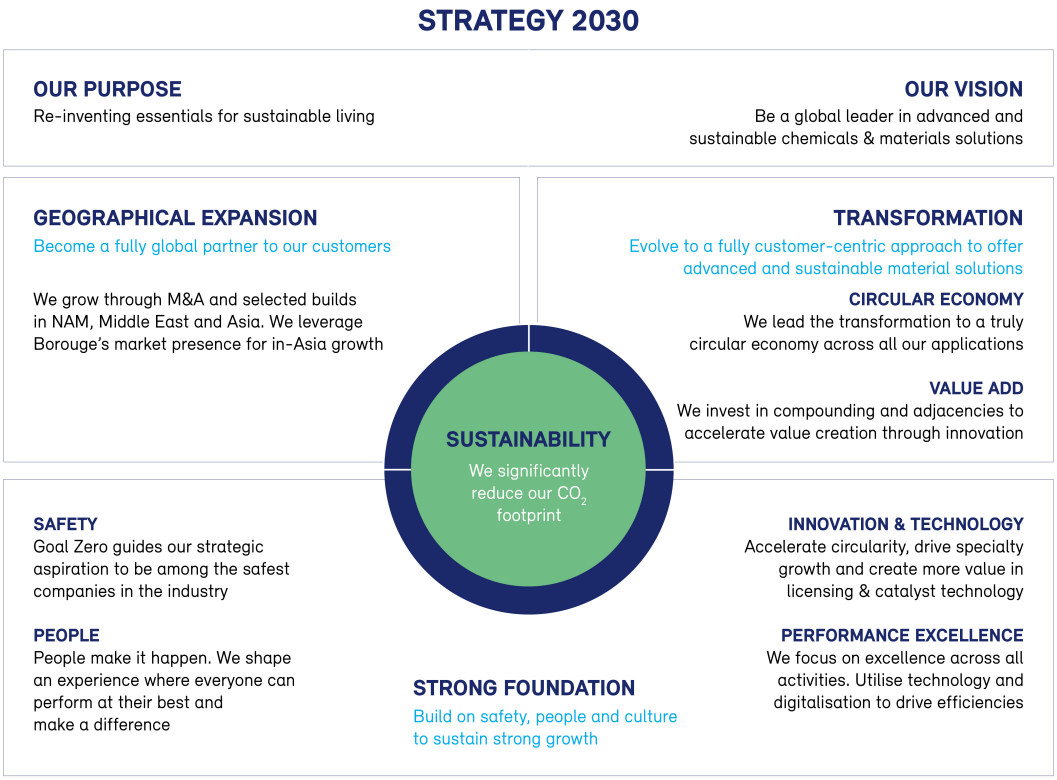
Borealis is a leading provider in the fields of polyolefins, base chemicals and fertilizers.

The polyolefin products manufactured by Borealis form the basis of many valuable plastics applications that are an intrinsic part of our daily lives. Borealis works closely with its customers and industry partners to provide innovative and value-creating plastics solutions that make end products safer, lighter, more affordable and adaptable. Advanced Borealis polyolefins have a role to play in saving energy along the value chain and promoting more efficient use of natural resources. Borealis provides services and products to customers around the world in collaboration with Borouge, a joint venture with the Abu Dhabi National Oil Company (ADNOC). The areas of polyolefins applications are wide-ranging and diverse. At Borealis, these areas are called Energy, Automotive, Consumer Products, and Pipe. New Business Development explores novel and potentially significant polyolefin products and applications. More information can be retrieved on our website, tab “Polyolefins”.

Borealis runs fertilizer production sites in Austria, France, the Netherlands and Belgium and melamine production in Austria and Germany. With its unique European-wide warehouse and distribution network, the business is ranked under the top 3 fertilizer producers and distributors in Europe. A reorganisation of the Borealis Base Chemicals business was carried out in 2018 in order to achieve increased customer focus and greater agility in reacting to specific market trends for the Fertilizers and Melamine business. The dedicated Fertilizer and Melamine business which became effective as of 1 January 2019 includes all business functions and comprises approximately 2000 employees. More information can be retrieved on our website, tab "Fertilizer" and for Melamine via tab "Base Chemicals”.

Borealis serves customers in over 120 countries with approx. 7,600 employees running Borealis production sites, innovation centres and customer centres around the globe. The employee segmentation per country can be found on Annual Report on page 108.

Our vision 2030 is to be the global leader in advanced and circular polyolefins solutions. Consequently, our strategy is built on three key pillars:



Borealis Strategy 2030

1.4 Borealis Commitment to Ethics

Borealis clearly acknowledges its corporate responsibility and ethical business conduct and strives to observe the Ten Principles of the United Nations, the International Bill of Human Rights, relevant International Labour Standards issued by the International Labour Organization and the OECD Anti Bribery Convention when doing business.

The Borealis Executive Board has issued a code of conduct named Borealis Ethics Policy, which incorporates the above-mentioned principles and standards. Borealis follows a zero-tolerance principle when it comes to corruption. Borealis has a comprehensive anti-bribery program in place, which covers the compliance with the FCPA, UK Bribery Act, the UK Modern Slavery Act, and other applicable laws wherever we do business. Borealis has also established a Responsible Sourcing Policy for its strategic suppliers. Both, the Borealis Ethics Policy and the Responsible Sourcing Policy can be found on the Corporate Website under the respective tabs.

1.5 Borealis Commitment to Sustainability

Borealis understands Sustainability not only as a question of responsibility, but a business imperative, and an opportunity to grow. Sustainability at Borealis is rooted in the company's values (Responsible, Respect, Exceed, Nimblicity™) and strongly linked to Borealis' vision and mission of value creation through innovation.

Borealis has developed a sustainability strategy focusing on 3 areas: (1) Circular Economy (2) Energy & Climate and (3) Health & Safety with a clear action plan and programme defined to ensure advancements in these materiality areas, all coming along with target setting.

Borealis monitors numerous environmental and social parameters such as air emissions, energy consumption, safety incidents, labour practices etc. in all of the company's operations and reports them on a yearly basis in its Annual Report published on the company's website.

Concerning the carbon footprint of our products across the value chain, we do not engage into providing either product or site-specific footprint or Life-Cycle Assessment (LCA) data. Information about the Eco-Footprint of Polyolefins can be retrieved from Plastics Europe, information about Fertilizers from the Cool Farm website.

Borealis participates in the yearly EcoVadis sustainability assessment. In this assessment, the company's performance in Environment, Labor & Human Rights, Ethics and Sustainable Procurement aspects are evaluated using 21 criteria, based on internationally recognised sustainability standards. In 2021, Borealis was awarded with an EcoVadis Platinum Medal which places our corporate social responsibility (CSR) performance in the top 1 percent of companies assessed by EcoVadis. In case you are interested in getting access to the assessment result, please contact EcoVadis.

1.6 Authorized Economic Operator (AEO)

The international security environment has changed over the years. Several initiatives to implement global terms and standards concerning risk management within the supply chain and customs processes have been created in response.

In 2005, the EU introduced the Authorized Economic Operator (AEO) concept as one of the main components of the so-called security amendment of the Community Custom Code.

AEO status has been granted to parent company Borealis AG and the majority of Borealis locations in the European community. Borealis is currently in the process of seeking AEO status for those Borealis locations which have not yet been certified.

Borealis is proud to have been acknowledged as a trustworthy organization fulfilling stringent criteria, including customs compliance, appropriate record keeping, financial solvency and, where required, appropriate safety and security measures .

Borealis remains fully committed to fulfilling its legal obligations concerning AEO and has taken appropriate measures to secure our business and the international end-to-end supply chain from a customs perspective.

For further information related to Borealis' AEO status, please send your inquiry to aeo@borealisgroup.com.

1.7 Borealis' Position on Responding to Third Party Inquiries

As we maintain numerous contacts with external parties, we receive on a regular basis inquires to respond or to sign third party code of conducts, reply to sustainability self-assessment questionnaires or to fill in customer forms. Responding to every of these individual inquiries whilst ensuring full reliability and accuracy of the information provided, goes beyond our resource capabilities. Likewise, committing to and signing a third party code of conduct next to our own Ethics Policy would require a full legal upfront assessment of each individual third party Code of Conduct and its possible consequences or impact for Borealis. We therefore trust you understand that we can only submit you with standard information as stated in this document. Further information can be retrieved from the company website as well as the Annual Report.

Concerning the sustainability performance, Borealis achieved the "Platinum Medal" in the 2021 EcoVadis assessment. In case you are interested in getting access to the assessment result, please contact EcoVadis directly.

Base Chemicals Production Locations

Location	BAM Linz	BAM Piesteritz	Kallo	Porvoo	Stenungsund	Grand-Quevilly	Grandpuits	Ottmarsheim
Company name	Borealis Agrolinz Melamine GmbH	Borealis Agrolinz Melamine Deutschland GmbH	Borealis Kallo N.V	Borealis Polymers Oy	Borealis AB	Borealis Grand-Quevilly	Borealis Grandpuits	Borealis PEC-Rhin SAS
Location Leaders	Jürgen Mader		Tom Geerts	Salla Roni-Poranen	Gauthier Hanquet	Ludovic Boulais	Alexandre Gschwind	Thibaud Tiberghien
Quality Contact	Michael Knesz		Heidi Dewitte	Riikka Laisi	Amanda Nordqvist Melander	Isabelle Martineau	Christine Perquin	Jean Pierre Emond
Address	St.-Peter-Str. 25, A-4021 Linz-Austria	Möllensdorfer Str. 13, D-0686 Lutherstadt - Wittenberg, Germany	Sint Jansweg 2 – Haven 1568 B9130 Kallo, Belgium	PO Box 330, FI06101 Porvoo, Finland	SE-444 86 Stenungsund - Sweden	30, rue de L'Industrie FR 76121 Grand-Quevilly - France	BP 12 FR 77720 Mormand - France	Route CD 52F, 68490 - Ottmarsheim- France
Yearly nameplate production capacity (ton)								
Melamine	50.000	80000						
Guanidine Carbonate	600							
NPK (Potassium)	410.000							320.000
Ammonia	500.000					425.000	439.000	235.000
Ammonia Solution	35.000						10.000	75.000
Nitric Acid	570.000					900.000	400.000	370.000
Compound Fertilizer (CAN -NP – NS)	690.000					568.000		380.000
Ammonium Nitrate (AN)						540.000	325.000	
AN Solution	20.000					135.000	68.000	
Urea	420.000							
Benzene				150.000				
Phenol				185.000				
Cumene				230.000				
Acetone				120.000				
Ethylene				380.000	620.000			
Propylene			480.000	230.000	228.000			
Butadiene				25.000				
FTBF					50.000			

Polyolefins Production Locations

Location	Burghausen	Monza	Schwechat	Porvoo	Stenungsund	Kallo	Antwerpen	Beringen	Geleen
Company name	Borealis Polymere GmbH	Borealis Italia S.P.A.	Borealis Polyolefine GmbH	Borealis Polymers Oy	Borealis AB	Borealis Kallo N.V.	Borealis Antwerpen N.V.	Borealis Polymers N.V.	Borealis Plastomers B.V.
Location Leader	Michael Freutsmiedl	Jürgen Artner		Salla Roni-Poranen	Anders Fröberg Markus Kierkegaard (as of 01 Oct 2022)	Wim De Smet		Stefan Caluwe	
Q-Management Representative	Stefan Schaller	Miguel Germano Neto		Riikka Laisi	Ingela Wastegard	Heidi Dewitte		Hassan Joul	
Address	Haimingerstr.1, D-84489 Burghausen	Via Ercolano 8/10, IT-20052 Monza	Danubiastrasse 21, A-2320 Schwechat	P.O.Box 330, FI-06101 Porvoo	SE-444 86 Stenungsund	Sint Jansweg 2– Haven 1568 B-9130 Kallo	Nieuwe Weg 1 - Haven 1053, B-2070 Zwijndrecht	Industrieweg 148, B-3583 Beringen	Koolwaterstofstraat 1, NL-6161 RA Geleen
Yearly nameplate production capacity (ton)									
PE			490.000	400.000	760.000		120.000		120.000
PP	600.000		435.000	220.000		300.000		390.000	
Compounds		60.000	110.000	35.000	200.000		120.000	93.000	

2. Quality Management System

2.1 Borealis Commitment to Quality

Borealis' commitment to quality is laid down in its quality policy, which is company-wide embedded in our activities. The enablers of the Borealis' Quality Policy are our employees: quality and customer satisfaction are the responsibility of us all. Based on this mindset, Borealis fundamental Quality principles are to

- strive to consistently meet or even exceed customer satisfaction through efficient business and manufacturing processes, managed and executed by competent people with the right attitude and behaviour applying our zero defects mindset,
- improve continuously and seek nimble solutions in order to fulfil the customer's today and future needs and
- whenever we fail to satisfy customer expectations, we do our utmost to recover customer confidence and to avoid that the problem occurs again.

An indispensable requirement to achieve this is a well-established integrated management system, which captures all controlled documents for quality, health, safety, environment and energy. The management system is complemented by competence building as well as sharing know-how and expertise through eLearnings, new employee introductions and continuous awareness, e.g. via a complaint and quality incident action monitoring system.

The Quality department is owner and ensures accessibility and that all documents are regularly reviewed. The compliance of the management system is monitored by performance indicators and verified frequently through internal audits and management system reviews with top management involvement.

Conformance to ISO standards are regularly audited by independent third party certification bodies, in addition local authorities and major customers are frequently auditing Borealis locations. The most recent certificates can be downloaded from our company website.

Borealis complies in all European locations to the ISO9001, ISO14001 and ISO50001 requirements. Depending on the product application or legal requirements, the particular Borealis locations are additionally certified according to IATF16949, ISO17025, ISO 45001, Fertilizers Europe Product Stewardship, FAMI QS, Kosher and ISCC.

Next to the integrated management system, Borealis has implemented a company-wide system

and process for continuous improvement to drive learning and best practice sharing beyond the commonplace standards, see chapter 2.4 for more details on this matter.

Customer satisfaction is monitored regularly via customer surveys and supported by an integrated complaint management system.

2.2 Product Traceability

Borealis operates a system of product traceability by SAP as a core tool. The effectiveness of this system is frequently evaluated.

Based on the demands of the BRCGS Issue 6 "Packaging Materials", Borealis introduced a yearly traceability testing procedure, to provide our customers in food packaging industry with the traceability testing acc. BRCGS6 clause 3.7.5. For evidence, please refer to the Appendix of this letter.

2.3 Customer Complaint Process and Corrective and Preventive Actions

Borealis' established processes are driven by zero defect mind-set and safeguarding delivery of conforming products.

Despite a tightly integrated set of controls before, during and after production, customers might still not be fully satisfied with the products and services Borealis delivers. In such cases, Borealis uses a formalised customer complaint handling process, recognising that effective complaint handling can enhance its reputation, customer relationships and customer satisfaction, even when it has initially not lived up to the customer's full expectations. Each complaint is taken seriously, registered, investigated and seen as an opportunity to learn. The information obtained through the complaint handling process therefore helps Borealis to improve its products, services and processes.

If a customer expresses dissatisfaction with Borealis' products, packaging or services, this expression is registered as a complaint and handled according to our customer complaint process. In case of a customer complaint, our intent for all customer complaints is to solve the customer's problem and correct the immediate cause of the defect, offer an appropriate compensation for the inconvenience caused when a complaint is justified and take the necessary actions to avoid that defects causing complaints occur again.

Dissatisfaction linked to specific orders are registered, whereas problems or requests for improvement of a more general nature are handled as a technical service request.

2.4 Continuous Improvement – The Borealis Way

Continuous Improvement is a mind-set embedded in the culture of Borealis and ensures a self-learning organization. The core principle of Continual Improvement is the (self) reflection of processes, which leads to the identification, reduction, and elimination of suboptimal processes. The related efforts seek incremental improvement over time or breakthrough improvement all at once.

In Borealis, we use an internally developed methodology called "The Borealis Way", which bases on the Six-Sigma approach and considers typically the following elements:

- Addressing issues with a simple and structured 5 step The Borealis Way (TBW) process: Define, Analyse, Solve, Implement and Review (DASIR);
- Applying a team-based problem solving technique;
- Involving the organization facilitated by own employees;
- Using a selection of consistent, reliable tools and promoting knowledge sharing.

The TBW methodology is the recommended way to improve products, services and processes within Borealis. It is used for complex projects but also for small improvements at local production and logistic sites. In this broader sense, all processes & tools, which lead to a sustainable improvement of the company, are included, such as (but not limited to):

- Idea management
- Incident management & near misses
- Waste elimination
- Internal audits
- Customer audits & feedback (including complaint handling)
- Certification & authority audits
- Management System Review
- Improvement/change projects

This supports the company's guiding principle that continuous improvement is the responsibility of each employee.

3. Borealis Position on Food Hygiene Demands and Standards for Polyolefin Related Products

3.1 Scope

This position statement is intended to answer most of the questions on food hygiene performance and the application of GMP that are directed to Borealis as a supplier of PE and PP raw materials for Food Packaging. This statement supports the packaging manufacturer to fulfil the BRC/IOP standard, ISO 22000 and EN 15593.

3.2 Raw Materials for Food

Borealis materials intended for food contact are regularly assessed regarding their compliance with the latest applicable legislation and standards. Legal compliance is confirmed per polymer grade in our Declaration of compliance to Food Contact Regulations, which can be downloaded from our website. The final responsibility for migration compliance lies with the manufacturer and the filler of the package.

3.3 Managing the Contamination Issue

Mechanical contamination

The polymerisation process is a closed process, where Critical Control Points are very few and are controlled by normal operating and quality procedures. This is also why we do not see a need to introduce special rules regarding excessive protective clothing or other restrictions on personnel's behaviour.

Microbiological contamination

The reasoning for mechanical contamination applies also to microbiological contamination. Further the high temperature (>200 °C) in the polymerisation and pelletising stages eliminates all biological activity.

Chemical contamination

Borealis operates a process for Incoming Chemicals, where all chemicals bought, used and sold are assessed and controlled. No preparations without known composition are allowed into our

system. Minor impurities, such as catalyst residues, may be present, but at levels of no concern.

3.4 Self Assessment Step by Step

In order to even better secure our delivery capabilities to the food packaging manufacturing sector, we have entered into a self-assessment of our process units. This is done by assessment based on FMEA principles:

Management of raw materials

- Before being approved for use in Borealis, all new raw materials are controlled by our experts for incoming chemicals regarding their compliance with applicable legislation and standards.
- Only selected and approved suppliers are used.
- All incoming raw materials are visually inspected if possible.
- Raw material properties are verified according to the specifications agreed with the supplier; incoming control is carried out according to internal procedures.
- Raw materials are marked after release and segregated according to approval status before being stored in appropriate, closed facilities.

Polymerisation and pelletising

- Preparation and dosing of raw materials is carried out according to product specifications and recipes stating defined tolerances and the raw material article number.
- Dosing of raw materials is controlled by process control systems and continuously monitored.
- Concentrations of additives in the final product are controlled through testing or mass balance calculations.
- All produced batches are identified with a unique batch number. This batch number is indicated on each CMR and CoA. Systems are in place for the traceability of raw materials and products.
- Transition rules secure a product sequence that minimises contamination risks.
- Treated water is used for pellet cooling.

Handling and storing before loading and packing

- All plants have dedicated transfer lines.

- Pellets and polymer dust generated during transfer are removed in accordance with our cleaning procedures.
- Bacterial contamination is limited through filtering of transfer air and regular filter changes.

Loading, storing and dispatching products in bulk

- Dedicated transfer lines exist for each plant at Borealis. Cleaning / flushing procedures to remove pellets from previous loading are in use.
- Requirements securing dry, clean and odourless tanks are reflected in forwarder contracts.
- Trucks are cleaned at SQAS audited cleaning stations; washing certificates are controlled (with exceptions for dedicated trucks in shuttle traffic carrying the same grade).
- Transhipment centres follow Borealis defined standards.

Packing, storing and dispatching packed products

- Only approved packaging material suppliers are used.
- The packaging materials conform to directive 94/62/EC (heavy metals, noxious and hazardous substances or regulations valid in the region where the material will be supplied).
- The packaging materials for pellets comply with the latest regulations on products intended to come into contact with food.
- The process is controlled through packaging orders stating product name, batch number and storage silos.
- Cleaning / flushing procedures to remove pellets from previous packing are in use.
- Warehouses are cleaned and checked regularly.
- Pest control measures are in place and monitored at all locations.
- Pallets are inspected before loading and corrected in case of deviations.

Transporting and delivery

- Strict regulations apply to material and construction of containers, gaskets and fittings.
- Bulk trucks are sealed during transport.
- Blowers on bulk trucks deliver air free of dust, oil and water and have filters removing particles larger than 5 microns from the transport air.

3.5 Compliance to Food Hygiene Demands and Good Manufacturing Practices (GMP) for Polyolefin related products

Based on the above description of our delivery process, we state that through our Quality and Incoming Chemicals Systems we

- are able to deliver products that can be safely used for hygienic food contact applications and make it possible for the packaging manufacturer to obtain applicable certification

- fulfil the general rules on GMP as laid down in the Articles 5, 6 and 7 of COMMISSION REGULATION (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food.

The described Borealis HSE&Q-management system has already been positively assessed several times in authority audits regarding its compliance with the applicable GMP-requirements.

4. Appendix – Traceability Evidence Data

In the following, we list up evidence data out of our traceability testing. This list is updated and expanded on a regular basis.

Plant: Burghausen PP4
Audit date: 29.10.2020
Batch No: 3210018270
QC final analysis ID: 30001001427
Homogenization and conveying: Verblaseanweisung 10.07.19
Production: reactor feed IP21 data 10.07.19
Raw Material Additives Batches: 0020041539 and 0020749350

Plant: Burghausen PP6
Audit date: 08.10.2021
Batch No: 3220009157
QC final analysis ID: 30001076975
Homogenization and conveying: Verblaseanweisung 03.12.2020 and 04.12.2020
Production: reactor feed IP21 data 03.12.2020
Raw Material Additives Batches: 7BF2104107, B3015298, B3015377, 20110401

Plant: Geleen PE
Audit date: 07.12.2020
Batch No: 2001364170
QC final analysis ID: 6585169
Homogenization and conveying: Partij traceability kaart 20012906CB
Production: Partij traceability kaart 20012906CB
Raw Material Additives Batches: FA192181 and 7AB7695609

Plant: Schwechat PE4
Audit date: 03.12.2020
Batch No: 2400008539
QC final analysis ID: 6964726
Homogenization and conveying: Siloblatt BL-4802 (09.10.2020) and T-4806 (09.10.2020)
Production: IP21 data 08.-09.10.2020
Raw Material Additives Batches: B3015440, 35540 and OO22233783

Plant: Schwechat LD3
Audit date: 11.11.2021
Batch No: 1130029275
QC final analysis ID: 7538277
Homogenization and conveying: Degassing silo E32 and Förderprotokolle 26.10.2021
Production: IP21 data 25.-26.10.2021
Raw Material Additives Batches: 1324466-01 till -07, 1326288-01 till -07, 2107469265, 2107469266, 2106469218, 2107469265, 000182827, 000186659, 1425276, 1428382, 50000100071, 50000101034

Plant: Stenungsund HDCo
Audit date: 27.10.2021
Batch No: 20186347
QC final analysis ID: 7505296, 7505420, 7505538
Homogenization and conveying: IP21 (02.10.2021)
Production: Production protocol (line journal L301/236, 02.10.2021)
Raw Material Additives Batches: 21/058/08, 23449556, 03202300

Plant: Porvoo PP
Audit date: 05.11.2021
Batch No: 63210537
QC final analysis ID: 7382307
Homogenization and conveying: PP-1001, pelletizing report 08.07.2020
Production: reactor feed Polymerization conditions 07.07.2021
Raw Material Additives Batches: PT-156, R14396, R14479, R14348, R14499, R14485, R14447, R14369, R14509, R14376 and R14274

ISSUER: This document is issued by Borealis Quality Management. Any remarks and questions about this document can be directed to quality@borealisgroup.com. Release date: 17 August 2022.