



Anti-Bribery and Corruption Policy

Effective Date November 1, 2023

Contents

| | |
|---------------------------------------|---|
| 1. PURPOSE | 1 |
| 2. SCOPE | 1 |
| 3. POLICY | 2 |
| 4. DEFINITIONS | 3 |
| 5. REPORTING | 4 |
| 6. CONSEQUENCES | 4 |
| 7. POLICY REVIEW AND EXCEPTIONS | 4 |

1. PURPOSE

LSB Industries, Inc. (together with its subsidiaries and affiliates, “LSB” or the “Company”) and its management endeavors to provide guidelines and rules that will help its employees to conduct business ethically and in compliance with the anti-bribery and anti-corruption laws and also adhere to our Business Code of Conduct (the “Code”) in situations where the risk of inappropriate actions is high while conducting business on behalf of LSB.

The purpose of this policy is to ensure that LSB complies with the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act (“UKBA”) and other similar regulations in all jurisdictions where it operates.

2. SCOPE

This policy applies worldwide to LSB and to all its directors, officers and employees (collectively, “LSB Employees”) as well as all third-parties, contractors, agents, distributors, and consultants when conducting business with, or on behalf of LSB. The scope of this policy is very broad and includes:

- All suppliers, both existing and potential



Anti-Bribery and Corruption Policy

- All customers, both existing and potential
- Employees and potential employees
- Independent contractors, agents and distributors of LSB
- Any individual or organization with whom any LSB Employee or other person covered by the policy comes into contact in their work-related capacity.

3. POLICY

3.1 Statement

LSB strictly prohibits corrupt interactions with Government Officials and individuals in the private sector to improperly influence official action.

- No employee or third party of LSB shall give, offer, promise, authorize or pay anything of value to any Government Official or any other person or entity including those in the private or commercial sector to induce the recipient to misuse his or her position or to obtain an improper business advantage.
- No employee shall request or accept a Bribe.
- No cash and Cash Equivalents are permitted.
- No facilitation payments are permitted.
- No employee will suffer negative consequences for refusing to pay a Bribe.

3.2 Facilitating Payments

Facilitating payments are prohibited under this Policy. Facilitating payments paid to Government Officials to expedite or facilitate nondiscretionary actions or services, such as:

- obtaining an ordinary license or business permit
- processing government papers such as visas
- providing police protection
- providing telephone, power, water, waste management services and garbage pick-up; or
- environmental clean up
- loading or unloading of cargo

Employees must avoid even the appearance of giving or receiving Bribes, kickbacks or engaging in other improper conduct when dealing with any individual, including Government Officials.

3.3 Third Parties

A third party cannot be used to try to hide a Bribe. Suppliers, agents, distributors, and business partners cannot offer or receive a Bribe related to working for LSB or on LSB's behalf. LSB employees and third parties are strictly prohibited from directly or indirectly giving, offering, accepting, promising, requesting or agreeing to any form of kickback or Bribery.



Anti-Bribery and Corruption Policy

LSB should not enter into any relationship with a third party who will have substantive interaction with Government Officials on behalf of the Company without first examining the third party's background, qualifications and reputation. LSB has implemented integrated global processes to identify and assess third parties on a risk-based basis. Third party relationships that may involve contact with Government Officials must be reduced to a written contract that includes appropriate language regarding compliance with applicable Anti-Corruption Laws as well as LSB expectation of ethical business practices.

3.4 Gifts and Entertainment Involving Government Officials

LSB Employees and others covered by this policy must not give or accept any gift(s) or entertainment from a third party which creates a conflict of interest, influences any business decisions made by or on behalf of LSB, constitutes a bribe or is in anyway illegal, or gives the appearance of impropriety.

4. DEFINITIONS

Anti-corruption Laws – any anti-bribery and anti-corruption laws applicable where LSB operates, including, but not limited to, the U.S. Foreign Corrupt Practices Act (“FCPA”) and the U.K. Bribery Act (“UKBA”) and other laws implementing the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, or the United Nations Convention against Corruption.

Bribes or Bribery – any payment, gift, offer, or promise of anything of value (e.g., cash, cash equivalent, jewelry, business meals, charitable contributions, educational or executive training expenses, political contributions, business opportunities, entertainment, travel amenities, etc.) to improperly influence a decision, or to secure any improper advantage. Local law may impose a broader definition in some jurisdictions.

Government Official – official of any government, representative of any political party, any candidate for political party, any officer or employee of a government or any department, agency (including at central or federal, regional or municipal levels) or instrumentality thereof (such as a government-controlled company or other commercial enterprise). The definition also includes any person acting in an official capacity for or on behalf of any such government or department, agency or instrumentality, or for or on behalf of any such public international organization.

Cash Equivalents - anything that can be easily converted to cash including, stocks, bonds, and other securities; precious metals or jewelry; gift cards or certificates that are exchangeable for goods or services.

“Other Things of Value” – other things of value include but is not limited to, use of vehicles or property, accommodations or valuable favors (such as educational and employment opportunities for friends and relatives), loans.

Conflict of Interest - when the private interests of an LSB employee interferes in any way with the interests of the Company.



Anti-Bribery and Corruption Policy

5. REPORTING

LSB employees must report known or suspected violations of this Policy or Anti-corruption Laws. LSB management will not retaliate or tolerate any harassment or retaliation of anyone for reporting, in good faith, known or suspected violations of laws, regulations, or LSB policies or procedures, including this, Policy.

Concerns may be reported to a supervisor, to the General Counsel, or via the LSB Ethics and Compliance Hotline, which is administered by third-party provider Navex Global. The Hotline reporting service is available 24 hours a day, 7 days a week. Written reports may be made online at: <https://lsb.alertline.com>. Telephone reports may be made to +1 888-625-0339. (This number is toll-free in the US and Canada).

You have the option to report violations anonymously. Any report will be handled confidentially. The General Counsel of LSB reports to the Audit Committee of the Board of Directors with respect to Hotline reports received and respective outcomes.

6. CONSEQUENCES

A violation of any Anti-corruption Laws may subject an LSB Employee to civil as well as criminal penalties. A breach of this Policy may result in disciplinary action up to, and including termination of, employment.

7. POLICY REVIEW AND EXCEPTIONS

Any requests for exception to this policy must be made to the General Counsel and may only be approved by the consent of the Chief Executive Officer and the Board of Directors.