



## Afton Chemical Corporation Responsible Care<sup>®</sup> Policy

In support of our Vision and Values and corporate goals, Afton Chemical Corporation will conduct all operations in a manner that protects our employees, neighbors, and the environment.

We will comply with all laws and regulations concerning health, safety (including process safety), environmental protection, and security (HSES), which affect our operations. We are also committed to the principles of pollution prevention, energy conservation and waste minimization. In addition, as a member of the American Chemistry Council, we are committed to fulfilling the Responsible Care<sup>®</sup> requirements including the Guiding Principles, designed to improve the performance of our industry in the area of HSES. Further, we will maintain a system to continually determine what laws, regulations and other requirements to which we may subscribe or be subject, and will cooperate with governments and organizations in the development of these.

Every employee at Afton Chemical Corporation is responsible for ensuring that the company's high standards in the area of HSES are upheld at all times. The senior management at Afton Chemical Corporation will ensure that this policy, any changes to it, and all relevant legal requirements, are effectively communicated to employees and other key stakeholders.

In keeping with Afton Chemical Corporation's overarching goal of zero incidents in the area of HSES, we will work with our employees and other key stakeholders to establish appropriate goals, objectives and targets, in order to periodically evaluate our performance in the area of HSES. Results from these evaluations will be used to take corrective or preventive actions, as required. We will strive for continual improvement in the area of HSES through the establishment of an effective Responsible Care<sup>®</sup> management system (RCMS<sup>®</sup> or RC14001<sup>®</sup>).

We will promote a spirit of openness with our key stakeholders including partners in our supply chain, so that hazards and risks associated with our products, processes and operations are available to them, commensurate with risk, and we will always address stakeholder concerns promptly and seriously.

With a view to ensuring the continued relevance of this policy to the nature, scale and impact of our company's operations, products and processes, we will review this policy annually, or whenever a significant change is considered.

While this is the overarching policy for the company in the area of HSES, there may be many other existing policies addressing specific areas within HSES, by which we will continue to abide.

Signed

A handwritten signature in black ink, appearing to read 'Warren Huang', with a stylized flourish at the end.

Warren Huang, President

April 26, 2012, Rev-3

