

## RAN P.O. Box 1028 | New York, NY 10185-1028 | (212) 554-3296

December 8, 2009

James R. Moore Corporate Compliance Officer and Deputy General Counsel Huntsman 500 Huntsman Way Salt Lake City, UT 84108

Re: Huntsman / Iran Business

Dear Mr. Moore:

Thank you for your response to our letter of November 23, 2009 regarding Huntsman's business in Iran. We appreciate your attention to the issue, but you fail to respond to key points raised in our letter.

In our letter, we clearly stated that we believe your decision to do business in Iran is wrong. Your response was that your business in Iran is in full compliance with U.S. law. However, as you know the technical compliance with law has little to do with the inappropriateness of your work in Iran.

You also attempt to rationalize your decision to do business in Iran by claiming that such business makes up a small fraction of Huntsman's global sales. UANI's concern is not with the amount of business that Huntsman conducts in Iran, but rather with Huntsman's deliberate decision to do business in a country that is the major state sponsor of terrorism and that is illegally developing nuclear weapons.

Regardless of the amount of business or the technical legality of Huntsman's activities in Iran, its decision to do business in Iran sends a clear signal that U.S. companies are willing to do business under the auspices of an Iranian regime that defies international law. Furthermore, if Huntsman has so little to lose by ceasing to do business in Iran, we question why you would continue to make sales in Iran when a decision to reverse course could send a strong message of isolation to the regime.

Moreover, Huntsman's sales in Iran are a powerful undercut to any effort at persuasion that U.S. Ambassador to China Jon Huntsman might employ to convince the Chinese government to impose sanctions on Iran – a key aspect of his diplomatic portfolio. How can it be that Ambassador Huntsman could persuade the Chinese government to impose further economic sanctions on Iran when his namesake former company continues to do business in Iran?



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You further assert that Huntsman polyurethanes are intended to be used for civilian applications such as automotive seating. We have no doubt that Huntsman polyurethanes have benign civilian uses. However, we question your inability to clearly confirm that such polyurethanes cannot be used for military purposes. You answer this question by saying that Huntsman does not *believe* the sale of these polyurethanes has any relevance to Iran's nuclear program. Are you, therefore, unable to *verify* whether there could be potential dual-use/military use for such polyurethanes?

We maintain our belief that your decision to do business in Iran is wrong and in contradiction to your own Business Conduct Guidelines.

We urge Huntsman to stop doing business in Iran.

Very truly yours,

Ambassador Mark D. Wallace