

## Mitsubishi Chemical Group EMEA

### Code of Conduct for Business Partners

The Mitsubishi Chemical Group (“**MCG**”) operating in Europe, Africa and Middle Eastern through its Affiliates (together “**MCG EMEA**” or “**We**”), is committed to operate as a responsible corporate citizen and to comply with all applicable local, national and international laws. Our mission is to be a leader in our industry and to continuously improve our performance, but in doing so we will not compromise our commitment to high standards in human rights, the environment and health and safety. We are determined to support the success of our customers in their markets and to give them a competitive edge – not only today but also in the future.

By working together with our stakeholders – customers, suppliers, workers and shareholders – we will shape a sustainable balanced business. That means recognising that we are part of a bigger world and choosing to **be a caring neighbour** by making a real contribution to the communities in which we live and work. It also means doing all that we do with **a passion for human rights, safety, health and the environment** so that every one of us goes home fit and well at the end of the day. These concepts form part of what we in MCG call our KAITEKI philosophy. KAITEKI is a Japanese word that encapsulates our MCG philosophy to use science and innovation to create and nurture a society where quality of life improves for all in a sustainable way. It’s a powerful concept that asks us all to think about the needs of our precious planet, our communities and our people as we work to create a lighter, brighter world. KAITEKI is at the very heart of why we are in business.

The fundamentals of our KAITEKI philosophy guide our workers and partners in respect of how we:

- manufacture responsible products
- conduct responsible operations
- are a responsible employer
- act responsibly towards our stakeholders and the local community

These guidelines also form the basis for this Code of Conduct for Business Partners (“**BPCoC**”), which outlines our expectations for Business Partner conduct regarding labour practices, human rights, health and safety, environmental protection as well as ethical, fair and sustainable business practices. Business Partners include all non-customer, third parties that we deal with (including but not limited to, suppliers, consultants, agents, distributors or other representatives and their respective affiliates, subcontractors and other parties throughout their entire supply chain (and Business Partners are fully responsible for ensuring compliance by any such party as if it were the party itself)) (“**Business Partners**”).

MCG EMEA Business Partners play a critically important role in our ability to operate and provide products and services to our customers. That is why we choose Business Partners carefully and with the expectation that they will act consistently in accordance with compliance and ethics requirements, with the principles envisaged in this BPCoC and always in full compliance with all applicable laws and regulations.

By agreeing to work for or with MCG EMEA, Business Partners commit to abide by this BPCoC.

We expect Business Partners to use a proactive approach in establishing and maintaining the standards set forth in this BPCoC, including the collection and evaluation of adequate and timely information as well as the provision of relevant documentation to MCG EMEA upon request. To verify compliance, MCG EMEA reserves the right to audit and inspect Business Partners' operations and facilities upon prior notice, either directly, indirectly or through an accredited body, and request corrective actions if deemed necessary.

## **A. LABOUR PRACTICES AND HUMAN RIGHTS**

MCG EMEA believes all workers deserve a safe, fair, hygienic and ethical workplace. Workers must be treated with dignity and respect. Our requirements are guided by the ten principles of the UN Global Compact (see **Appendix 1**) and the conventions and recommendations of the International Labour Organisation (ILO). We expect our Business Partners to also sustain the highest standards of human rights in both their own operations and those of their suppliers.

### **• Discrimination, harassment and abuse:**

Business Partners shall not discriminate against any individual based on gender, age, disability, marital status, sexual orientation, race, ethnicity, national origin, social origin or status, indigenous status, religion, caste, political affiliation or union membership, in hiring and other employment practices (including but not limited to salary, promotions, rewards, access to training, employment termination and retirement). Medical tests required from workers or potential workers are only to be used in a non-discriminatory way. Business Partners shall provide a workplace free of harassment, coercion and abuse. Any threats or other forms of intimidation are to be prohibited. Comments, slurs, jokes or derogatory statements based on any of the preceding are unacceptable and shall not be tolerated.

### **• Prevention of forced labour and human trafficking:**

Business Partners shall ensure that:

- All work is carried out without force with the individual's free will.
- They do not permit the trafficking of persons or use any form of forced, bonded, slave or prison labour.
- Workers are not required to surrender any government-issued identification, passports, work permits or travel documents as a condition of employment/engagement.
- Contracts clearly mention the conditions of employment/engagement in clear language understood by the workers.
- Workers shall be free to terminate their employment/engagement upon reasonable notice.
- They do not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities.

• **Prevention of child / underage labour:**

Business Partners shall employ only members of staff who have received the applicable minimum legal age. Legitimate workplace apprenticeship programs for educational benefit may be provided that are consistent with Article 6 or 7 of ILO Minimum Age Convention No. 138.

• **Working hours:**

Business Partners shall follow all applicable laws and regulations with respect to working hours and days of rest.

• **Wages & salaries:**

Business Partners shall ensure that all workers receive:

- Fair and reasonable pay and working conditions.
- At least the legally mandated minimum wages and salaries, vacation time, leave periods and time off for legally recognized holidays according to applicable law and / or collective agreements.
- Compensation for overtime hours according to applicable law and / or collective agreements.
- A fair remuneration package with due recognition for performance and accurate wages in a timely manner.

• **Freedom of association and collective bargaining:**

As legally permitted, Business Partners shall freely allow workers to associate with others, form and join (or refrain from joining) organisations of their choice and seek representation to bargain collectively, without undue interference, retaliation, discrimination or harassment. Business Partners shall allow workers to express their concerns about working conditions without threats of reprisal or harassment.

• **Conflict Minerals Sourcing:**

Business Partners will not source tin, tantalum, tungsten or gold (the “**Conflict Minerals**”) from the Democratic Republic of the Congo or the adjoining countries (the “**Covered Countries**”) in a manner which directly or indirectly finances or benefits armed groups in the Covered Countries. Business Partners must commit to abide by all applicable laws and regulations related to Conflict Minerals and agree to provide all necessary information requested by MCG EMEA concerning products supplied by Business Partner to enable MCG EMEA to complete its reasonable country of origin inquiries and due diligence with respect to Conflict Minerals.

## **B. HEALTH AND SAFETY**

The health and safety of workers is of prime importance to MCG EMEA. Our view is that companies will achieve good performance by establishing and maintaining best practices by using a risk-based approach to identify, assess and address vulnerabilities, prevent and mitigate incidents, enhance training and response capabilities, and maintain and improve management systems and key networks for health and safety related activities.

Business Partners are expected to provide and maintain a safe work environment and encourage robust health and safety practices.

• **Occupational health, safety and hazard prevention:**

A safe and healthy working environment must be provided for all workers, in accordance with all applicable laws and regulations, with the aim of creating an incident- and injury-free work environment and preventing the occurrence of occupational illness and health problems associated with its activities. Business Partners shall identify, evaluate and manage occupational health and safety hazards through a prioritized process of hazard elimination and control. Workers shall be provided with job-related, appropriately maintained personal protective equipment and instruction on its proper use.

• **Emergency management:**

Business Partners shall identify and assess potential emergency situations. For each situation, Business Partners shall develop and implement emergency plans and response procedures that minimise harm to life, environment and property.

• **Sanitation, food and housing:**

Business Partners shall provide all workers with accessible and clean toilet facilities and drinking water. Dining, food preparation and storage facilities shall be sanitary. Dormitories, where provided by the Business Partner, are to be maintained to be clean and safe and provided with appropriate emergency exits, hot water for bathing and showering, adequate heat and ventilation, reasonable personal space along with reasonable entry and exit privileges.

• **Communication & training:**

Workers must be adequately informed about health and safety issues and provided with appropriate training in their regional language to minimise health and safety risks associated with their job assignments.

## **C. ENVIRONMENTAL PROTECTION**

MCG EMEA supports the concept of sustainability and expects responsible companies to act as stewards of the environment. Our Business Partners are expected to contribute to this by obeying all environmental laws and regulations and conducting all actions in a resource-conserving manner.

• **Quality Requirements:**

Business Partners shall meet the contractually agreed or requested quality requirements to provide products and/or services that meet MCG EMEA's needs, perform in accordance to their warranty and are safe for their intended use.

• **Process safety and resource efficiency:**

Business Partners shall have programs to safely manage and maintain their production processes in accordance with applicable safety standards. Business Partners are expected to implement continuous improvement practices to reduce energy, water and natural resource consumption by implementing conservation and substitution measures.

• **Disposal of waste material:**

Business Partners shall implement a systematic approach to identify, manage, reduce and responsibly dispose of or recycle hazardous and non-hazardous material.

• **Management of wastewater:**

Business Partners shall implement a systematic approach to identify, control and reduce wastewater produced by its operations. Business Partners shall conduct routine monitoring of the performance of its wastewater treatment systems.

• **Management of air emissions:**

Business Partners shall identify, manage, reduce and responsibly control air emissions released from its operations that pose a hazard to the environment. Business Partners shall conduct routine monitoring of the performance of their air emission control systems.

• **Prevention of pollution:**

Business Partners shall minimise hazardous substance consumption by implementing reduction / substitution measures and prevent pollution of soils.

• **Permits and reporting:**

Business Partners shall obtain, keep current and comply with all required environmental permits. Business Partners shall comply with the reporting requirements of applicable permits and regulations.

• **Safety and health risks for local residents:**

Business Partners will evaluate the impact of their activities on local residents. The results are to be documented.

#### **D. PRODUCT STEWARDSHIP**

Business Partners will act in accordance with the best practice principles of product stewardship. Business Partners will identify the risks and environmental impact attached to their products during the production, distribution and transportation process as well as their entire lifecycle and look for opportunities to reduce these. In this context, Business Partners share relevant knowledge, expertise and experience with their own suppliers, customers and other parties.

#### **E. PRODUCT REGULATORY REQUIREMENTS**

Business Partners must understand and comply with all applicable national, local and international environmental laws, requirements and regulations. Examples of these are: the US Toxic Substances Control Act (TSCA), the Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH); and the Globally Harmonised System of Classification and Labelling of Chemicals (GHS), Directive 2001/83 EC code relating to medicinal products for human use, Regulation EU 2017/745 on medical devices or GXP related regulations as applicable.

Upon request, Business Partners will certify that the products and services it supplies are manufactured and marketed in accordance with applicable laws, regulations and requirements. Business Partners may be asked to verify compliance with these requirements by and are obliged to provide appropriate information and documentation to MCG EMEA.

Business Partners importing products into a region, for example the EU, shall be responsible for all registration and other REACH requirements for chemical products to fulfil all REACH obligations and supply all necessary documentation to MCG EMEA.

Business Partners warrant that any materials returned will be disposed of, recycled, recovered, or reclaimed and not unlawfully landfilled, in accordance with all applicable international, federal, state, local and European Union environmental laws and regulations of the country of where the material is located.

## **F. ETHICS AND FAIR BUSINESS PRACTICES**

We expect our Business Partners to conduct business in a fair and ethical manner.

### **• Laws & regulations:**

Business Partners must operate in full compliance with international, national and local laws and regulations that are applicable to their business operations and obtain all necessary permits. In particular, Business Partners commit to adhere to conduct their business in accordance with fair competition and in compliance with anti-trust and other competition laws, international trade and export control regulations as well as embargoes imposed by national or supranational bodies or governments.

### **• Corruption:**

Business Partners shall refrain from any and all forms of corruption, including extortion and active or passive bribery, money laundering and insider trading. Business Partners shall specifically ensure that payments, gifts or other commitments to customers, government officials and any other party are in compliance with applicable antibribery laws.

### **• Gifts:**

Business Partners must respect that MCG EMEA workers or agents do not give or accept any gift or favor in order not to compromise or raise doubts about the neutrality of the decisions made by MCG EMEA or the Business Partner.

### **• Conflicts of interest:**

Business Partners must disclose to MCG EMEA information regarding potential conflicts of interest as a Business Partner, including disclosure of any financial interest that an MCG EMEA employee or agent may hold in the Business Partner's business.

### **• Confidentiality:**

Business Partners shall protect, use only appropriately and not improperly disclose all confidential information provided by MCG EMEA, its affiliated companies and its respective business partners.

- **Privacy and Intellectual property:**

Business Partners shall protect the personal data of workers, customers, suppliers, and other data subjects and comply with all applicable data protection laws. Business Partners will respect the know-how, patents, and trade/business secrets of MCG EMEA and third parties. They do not pass such information on without prior express written consent of the rights holders.

- **Sustainable procurement:**

Business Partners shall procure goods and services in a responsible manner. They shall select their own suppliers and business partners providing goods or services based on standards comparable to those set forth in this BPCoC.

- **Animal Welfare**

If applicable to the Business Partners' industry, animal testing will be minimised and alternatives will be used whenever possible, scientifically valid and acceptable to regulators.

- **Standards when Conducting Clinical Trials**

Business Partners are expected to conduct clinical trials in accordance with the international guidelines, the current national and local laws and regulations and the strictest medical, scientific and ethical principles, in particular the Declaration of Helsinki.

- **Training and Competency:**

Business Partners shall establish training measures to allow their workers to know and understand the contents of this BPCoC, the applicable laws and regulations and generally recognised standards.

- **Identification of Concerns:**

Business Partners will provide tools for their workers to report matters and/or potential breach of law in the workplace. Any report requires it to be treated confidentially. Business Partners commit to investigate such reports and implement corrective action, if needed.

## **G. REPORTING OF VIOLATIONS / WHISTLEBLOWER SYSTEM**

MCG EMEA is committed to doing business with integrity, and we expect you to uphold this commitment in your day-to-day actions. We depend on our workers and Business Partners to follow the law and to act responsibly. As a condition of engagement by MCG EMEA, all Business Partners are expected to comply with this BPCoC, MCG EMEA policies and standards of business conduct. You are required to complete and return the attached Certification to your business point of contact at MCG EMEA.

When in doubt about ethical or legal responsibilities, Business Partners should seek clarification from a member of MCG EMEA management, or from a member of the EMEA Legal & Compliance Department. Violations of this BPCoC or MCG EMEA policies are grounds for disciplinary action up to and including termination of your engagement.

Business Partners who are aware of suspected violations of this BPCoC or other MCG EMEA policies should immediately report such matters to their business point of contact, a member of MCG EMEA management or the EMEA Legal & Compliance Department. Insofar as there is any potential or actual violation of this BPCoC (such as human rights or environmental obligations) in the Business Partner's sphere of influence, the Business Partner shall be obliged to remedy the issue immediately at its own expense. MCG EMEA shall be entitled, at the expense of the Business Partner concerned, to take appropriate preventative or remedial action within the Business Partner's sphere of influence to prevent or end a violation or to minimise the extent of a violation. If a Business Partner fails to comply with this BPCoC or fails to prevent or remedy a violation within an appropriate period of time, MCG EMEA may take action against the Business Partner, including suspending or terminating business relations, without any right of Business Partner to any compensation.

If Business Partners do not feel comfortable with any of these reporting methods, they may call MCG EMEA's Ethics Hotline, a toll-free telephone hotline available to Business Partners 24 hours a day, 7 days a week. Anonymous hotline phone numbers and a non-anonymous reporting email address are attached to this BPCoC as **Appendix 2**.

When Business Partners call the Hotline, a trained specialist from an outside service provider will ask you questions about your concern and ask you whether you wish to remain anonymous. Regardless of whether you request anonymity, the call will never be traced, tracked or recorded. Only a written summary will be retained and provided to the Chief Compliance Officer of MCG EMEA for handling. At the end of the call, you will receive a case number and the date on which you may call back to receive an update.

**Mitsubishi Chemical Group EMEA**

May 2023



## **Appendix 1**

### **United Nations Global Compact**

The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment, and anti-corruption:

#### **The Ten Principles**

The Principles of the Global Compact are based on a universal consensus and are derived from;

- The Universal Declaration of Human Rights
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption

#### **Human Rights**

Principle 1: Businesses should support and respect, within their sphere of influence, the protection of internationally proclaimed human rights;

Principle 2: make sure that they are not complicit in human rights abuses.

#### **Labour Standards**

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour;

Principle 6: the elimination of discrimination in respect of employment and occupation.

#### **Environmental Protection**

Principle 7: Businesses should support a precautionary approach to environmental challenges,

Principle 8: undertake initiatives to promote greater environmental responsibility;

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

#### **Fighting Corruption**

Principle 10: Businesses should work against corruption in all its forms, including extortion

**Appendix 2**
**ETHICS HOTLINE COUNTRY-SPECIFIC NUMBERS**

<b>Country</b>	<b>Telephone number</b>
Austria	00800 72332255
Bahrain	8004264
Belgium	00800 72332255
Brazil (Portuguese/English)	0800 892 0328
Canada (English or French Canadian)	1 877 599 8073 1 877 564 9624
France	00800 72332255
Germany	00800 72332255
Hungary	00800 72332255
Israel	012 800 7233 2255 (Golden Lines)
Israel	013 800 7233 2255 (Barak)
Israel	014 800 7233 2255 (Bezeq)
Italy	00800 72332255
Mexico (Spanish)	001 866 863 2403 001 844 671 9161
Netherlands	00800 72332255
Poland	00800 72332255
Romania	0372 741 942
Russia	810 800 72332255
Slovakia	0800 004 996
Spain	00800 72332255
Sweden	0850 252122
Switzerland	00800 72332255
South Africa	00800 72332255
Turkey	00800 4488 20729
United Kingdom	0800 915 1571
United States (English)	1 877 564 9624

**OTHER REPORTING OPTIONS**

Anonymous online reporting via: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

Non-anonymous e-mail reporting to the Chief Compliance Officer of MCG EMEA: [emea-ethics@mcgc.com](mailto:emea-ethics@mcgc.com)

### **Business Partner Certification**

A commitment to integrity, honesty and high ethical and legal standards is critical to our continued success. We are counting on you to do your part.

All Business Partners are expected to know and follow this BPCoC and to act with integrity in conducting work related to MCG EMEA's business. You are expected to know and follow all laws that apply to your job. If you learn something that suggests that this BPCoC has been violated, you are expected to report the matter immediately. Please sign below that you have read and will abide by this BPCoC.

We agree to abide by its contents in providing services to MCG EMEA.

Business Partner: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_