

CODE OF CONDUCT FOR EXTERNAL USE

Guidelines for ethical third-party partnerships

INTRODUCTION

Sumitomo Chemical Europe S.A./N.V. (“SCE”) expects all third parties—suppliers, service providers, distributors, agents, consultants, contractors and any other business partners (collectively “Third Parties”)—to conduct their activities ethically, responsibly, and in compliance with applicable laws.

This Third-Party Code of Conduct (“Code”) outlines minimum standards required when conducting business with SCE and is derived from the company’s internal Code of Ethics.

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ETHICAL & LEGAL COMPLIANCE

ETHICAL AND LEGAL STANDARDS

Lawful and Ethical Behavior

Third-party partners must uphold lawful and ethical behavior aligned with responsible business conduct principles.

Regulatory Alignment

Partners must comply with all applicable EU, national, and local laws governing chemical operations, safety, labor and environment.

Integrity and Accountability

Integrity, transparency and accountability must guide decisions, communications, and operations to prevent legal and reputational risks.

Compliance Program Implementation

Effective compliance programs should be well-documented, monitored, and enforced to maintain consistent adherence to standards.

ANTI-BRIBERY AND ANTI-CORRUPTION



Zero-Tolerance Policy

SCE enforces a zero-tolerance policy against bribery and corruption for all partners and suppliers.

Prohibited Practices

Prohibited acts include offering or accepting cash, kickbacks, excessive gifts and disguised favors.

Vigilance with Public Officials

Interactions with public officials require increased vigilance due to severe legal penalties for violations.

Anti-Corruption Framework

Effective frameworks include internal controls, due diligence, record keeping and reporting suspicious conduct.



GIFTS & HOSPITALITY RULES

No Influence on Decisions

Gifts or benefits must not influence or appear to influence business decisions by employees.

Modest and Transparent Hospitality

Hospitality should be modest, infrequent, lawful, transparent and never create obligations.

Strict Prohibition of Cash Gifts

Cash or cash equivalents are strictly prohibited to avoid conflicts of interest.

Compliance and Documentation

Maintain internal guidelines, approval workflows and full documentation to ensure compliance.

LABOUR & HUMAN RIGHTS

FAIR LABOUR PRACTICES

Commitment to Non-Discrimination

Employment decisions must be free from discrimination based on age, gender, ethnicity or other protected characteristics.

Safe and Respectful Workplace

Partners must prohibit harassment, abuse and intimidation to ensure a hostile-free workplace environment.

Fair Employment Conditions

Employees should receive written contracts, fair pay, reasonable hours, legally mandated benefits and freedom to join labor organizations.

Compliance and Training

Programs must include worker rights training, grievance mechanisms and continuous labor condition monitoring.



SAFETY AND WORKPLACE WELL-BEING

Robust Safety Programs

Partners must implement comprehensive occupational health and safety programs to manage chemical industry risks effectively.

Preventive Controls and personal protective equipment

Use of personal protective equipment and preventive controls is essential for hazard communication and routine safety inspections.

Third-Party Compliance

Suppliers and contractors must ensure subcontractors and logistics providers adhere to safety and health standards.

Safety Culture Benefits

A strong safety culture minimizes accidents, protects communities and supports continuous operations aligned with Responsible Care principles.



ENVIRONMENT & PRODUCT STEWARDSHIP

ENVIRONMENTAL COMPLIANCE



Legislative Compliance

All environmental activities must comply with laws covering waste, air emissions, water protection and hazardous materials.

Pollution Prevention

Partners should adopt strategies to reduce pollution and waste while implementing sustainable practices wherever possible.

Monitoring and Reporting

Regular monitoring and documentation are essential, with prompt reporting and mitigation of environmental incidents.

Continuous Improvement

Ongoing improvement in environmental performance protects ecosystems and supports sustainability commitments.

REACH & CHEMICAL SAFETY OBLIGATIONS

REACH Regulatory Compliance

REACH mandates proper registration, evaluation and authorization of chemical substances in the EU market.

Safety Data and Communication

Accurate Safety Data Sheets and exposure scenarios must be communicated across the supply chain effectively.

Traceability and Stewardship

Partners must track chemicals and manage stewardship obligations to ensure responsible chemical management.

Consequences of Non-Compliance

Failure to comply with chemical safety regulations can cause serious legal, commercial and environmental risks.



BUSINESS INTEGRITY

FAIR COMPETITION



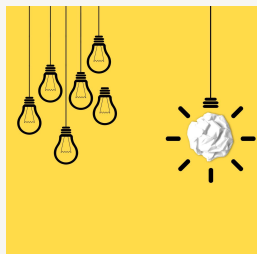
Avoid Anti-Competitive Practices

Third-party partners must avoid price-fixing, bid-rigging, market allocation and sharing sensitive competitor information.



Compliance Training and Controls

Partners should train personnel on antitrust rules and enforce strict controls to prevent improper information exchange.



Benefits of Ethical Competition

Ethical competition promotes innovation, fair pricing and market integrity fostering transparent commercial environments.

ANTI-MONEY LAUNDERING PRACTICES

Transparency and Verification

Partners must maintain transparent financial practices and verify customer identities to prevent illicit activities.

Legitimate and Traceable Payments

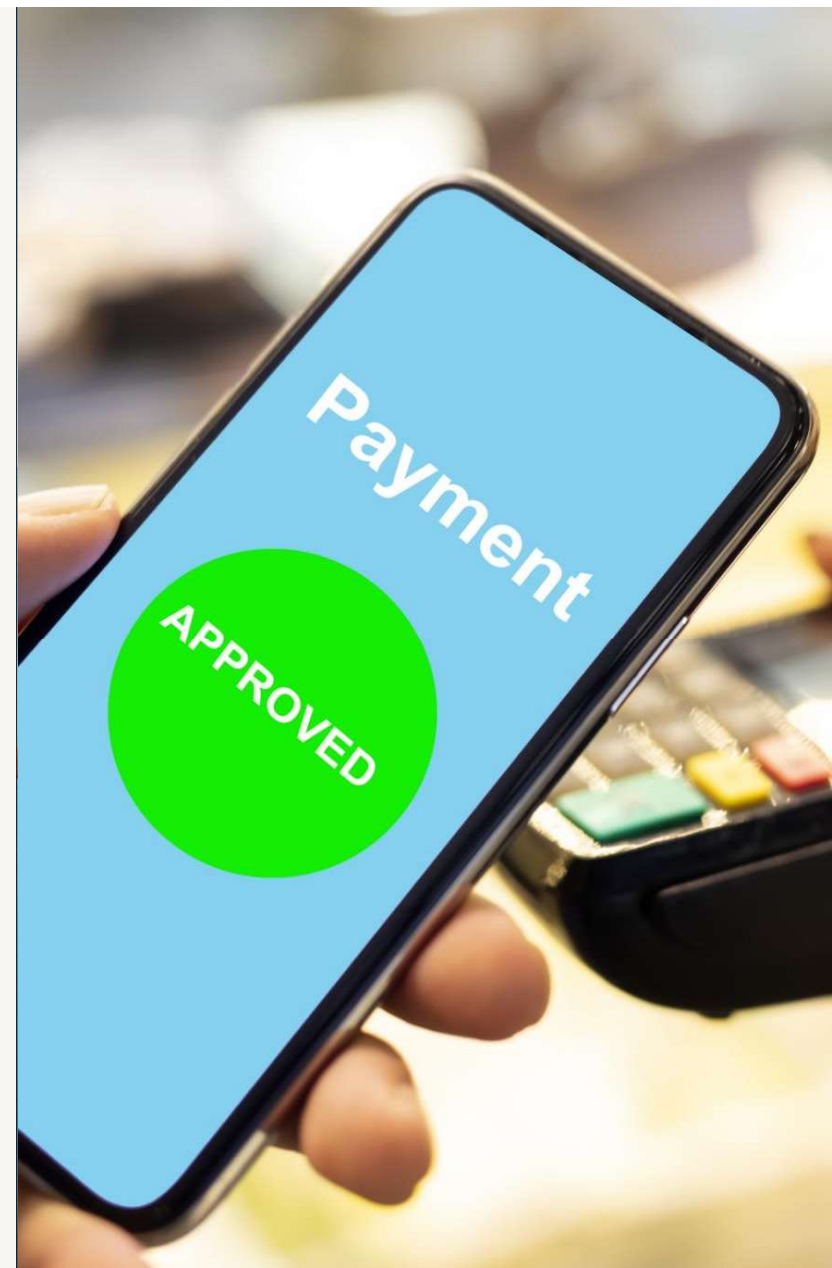
Payments should be legitimate, traceable and free from unusual transactions like overpayments or unexplained intermediaries.

Accurate Record Keeping

Maintaining accurate financial records is essential to uphold accountability and compliance with regulations.

Reporting Suspicious Activity

Prompt reporting of suspicious activities strengthens supply chain integrity and reduces risks for all parties.



CONFLICT OF INTEREST STANDARDS

Avoiding Conflicts

Suppliers and partners must avoid personal or financial interests that compromise objectivity or obligations.

Disclosure of Conflicts

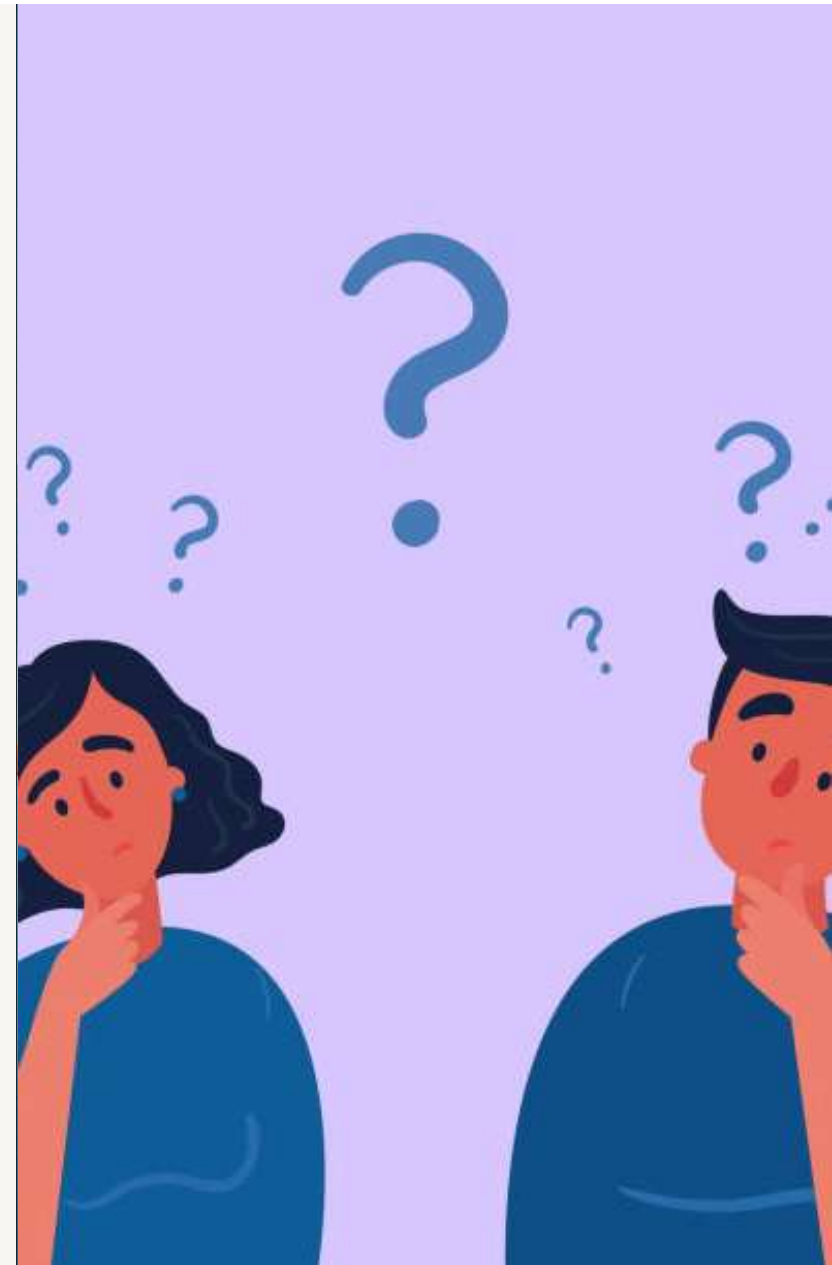
Immediate disclosure of potential conflicts through family ties, business interests or personal relationships is mandatory.

Impartial Decision-Making

Implement procedures like separating functions, documented reviews and reassignments to ensure impartial decisions.

Transparency and Trust

Transparency fosters fairness, maintains trust and supports sound procurement and commercial decisions.



TRADE COMPLIANCE



EXPORT CONTROL & SANCTIONS COMPLIANCE

Strict Regulatory Compliance

Partners must adhere to EU and national export control laws including sanctions and dual-use regulations to ensure legal trade practices.

Screening and Licensing

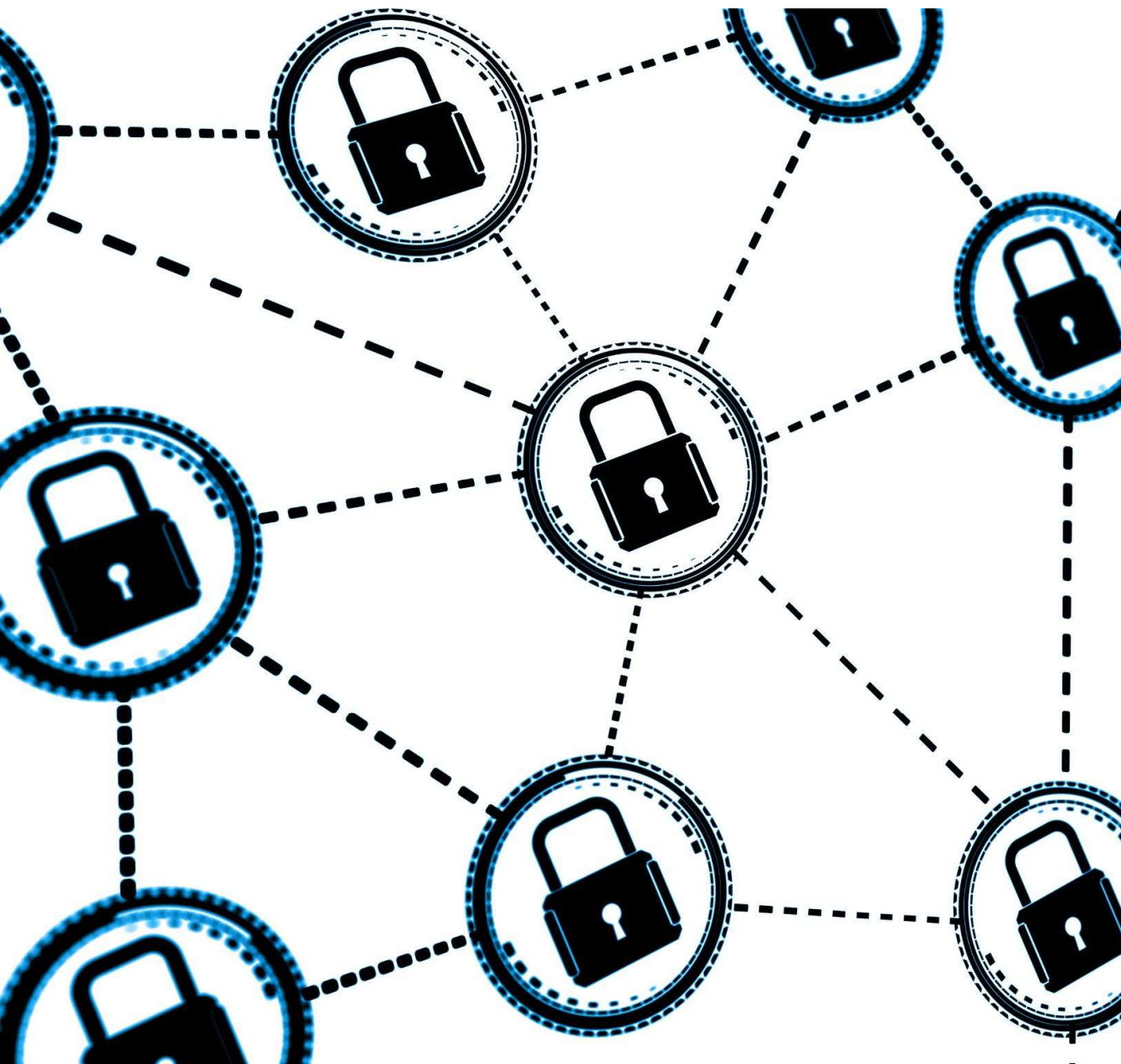
Screening customers, intermediaries and destinations for embargoes and obtaining licenses before transferring controlled goods is mandatory.

Due Diligence and Monitoring

Ongoing due diligence, documentation and regulatory monitoring prevent violations and ensure sustained compliance with export controls.

Global Security Protection

Strong compliance safeguards global security by preventing misuse of sensitive technologies and chemicals while upholding legal commitments.



END-USE AND END-USER RESPONSIBILITIES

End-Use Verification

Third parties must verify products are used for legitimate and lawful purposes to ensure responsible distribution.

Warning Signs and Escalation

Unusual orders or vague explanations require careful investigation and escalation to prevent misuse.

Documentation and Compliance

Proper end-user documentation supports regulatory compliance and prevents diversion to prohibited applications.

DATA PROTECTION & CONFIDENTIALITY

GDPR & PERSONAL DATA PROTECTION

GDPR Compliance Importance

Partners must comply with GDPR and similar laws to protect sensitive personal and commercial data.

Data Security Measures

Personal data should be collected legitimately, stored securely and shared only on a need-to-know basis.

Breach Response Protocol

Third parties must implement breach response, encryption, and access controls with prompt notification to SCE.

Building Trust Through Protection

Protecting personal data enhances trust among partners and prevents regulatory or reputational damage.





CONFIDENTIAL INFORMATION & IP RIGHTS

Safeguarding Confidential Data

Partners must protect sensitive technical data, pricing and regulatory information by implementing secure storage and access controls.

Nondisclosure Compliance

All contractors and employees must understand and comply with nondisclosure agreements to prevent unauthorized information sharing.

Respect for Intellectual Property

Partners must avoid unauthorized use, distribution or reverse-engineering to protect SCE's intellectual property rights and competitive advantage.

CONCLUSION & EXPECTATIONS

SUMMARY OF RESPONSIBILITIES

Legal and Ethical Compliance

Third parties must adhere to laws and ethical standards ensuring responsible business conduct.

Environmental and Safety Stewardship

Partners must practice environmental care and safe chemical handling to protect people and planet.

Transparency and Data Protection

Maintaining open communication and safeguarding sensitive data is essential for trust and security.

Respect and Responsible Trade

Respect for human rights and responsible trade practices ensure sustainable supply chains.





COMMITMENT TO ONGOING COLLABORATION

Continuous Improvement

Ongoing improvement and proactive engagement are vital for strong partnerships and business success.

Open Communication

Encouraging questions and reporting concerns without delay fosters transparency and risk mitigation.

Ethical Partnership

Trust, shared values and adherence to ethical codes build long-term, sustainable business relationships.

Support and Collaboration

Providing guidance and working together enables effective problem-solving and partner success.



SUMITOMO CHEMICAL EUROPE