

## **Business Partner Code of Conduct**

### **1. Purpose and Scope**

Mitsui Chemicals Europe GmbH (“MCE”) is a highly-respected international company, fully owned by Mitsui Chemicals, Inc. and enjoys an excellent reputation throughout the world. Its operations are governed by this Code of Conduct (“Code”), which is an integral part of our responsibility-conscious management structure. This Code applies throughout the world to all Business Partners and Stakeholders of MCE (“Business Partner”).

The foundation of all transactions at MCE is compliance with all binding statutory requirements at the national and international level, as well as compliance with voluntarily accepted obligations. It is the Business Partners’ responsibility to know and understand the laws applicable and to comply with both the letter and the spirit of these laws.

All Business Partners are obligated to inform themselves regarding the requirements applicable to their area of responsibility and to obtain additional information and advice from the relevant offices in cases of doubt.

### **2. Ensuring Fair Competition**

MCE expects its Business Partners to comply with the applicable laws for the protection of fair and open competition. The applicable statutory provisions generally prohibit price or term agreements with competitors, agreements with competitors for the purpose of market, or customer allocation, coordinated actions with competitors with respect to prices, terms, market, or customers, as well as unfair practices.

### **3. The Fight against Corruption**

MCE is convinced of the quality of its products and the capabilities of its Business Partners. MCE absolutely prohibits acceptance and provision of bribery of and from Business Partners with money or objects of value.

**4. Compliance with the Basic Principles of National and International Trade**

MCE adheres to all national, multinational and supranational foreign trade regulations. All Business Partners are obligated to adhere to all official authorization provisions, in particular the applicable export and import prohibitions, as well as the applicable duty and tax requirements. Compliance with the national and international provisions for the prevention of money laundering and the responsible handling of precious metals are of particular importance to MCE.

**5. Creating and Maintaining Safe and Fair Working Conditions**

MCE expects its Business Partners to create and maintain a safe and attractive work environment for its employees and to avoid adverse impact and injury to the environment and communities in which it conducts its business. Business Partners shall provide fair wages and reasonable hours of work, and rejects all forms of forced labor and child labor. MCE expects that its Business Partners, in particular its executives, will ensure occupational safety at any time.

**6. Environmental Safety and Product Safety**

MCE considers itself obligated to deal respectfully with the resources of nature. Compliance with applicable statutory provisions for the protection of the environment is therefore self-evident. With its innovative products for environmental protection, MCE makes an important contribution to the long-term protection of the foundation of human life. MCE places the highest requirements on the quality and safety of its products over the entire product lifecycle.

The Business Partner commits to comply with all applicable legal provisions for the protection of the environment, including the requirements under any chemicals legislation and waste legislation, to minimize environmental impacts on soil, water and air, and to continuously improve its environmental performance

**7. Compliance with German Labor Protection and Working Hours Laws**

As a company operating in Germany and committed to international standards of responsibility and care, we strictly adhere to the provisions of the Arbeitsschutzgesetz (Occupational Health and Safety Act) and the Arbeitszeitgesetz (Working Hours Act). All employees, managers, and contractors are required to comply with applicable occupational safety regulations to ensure a safe and healthy working environment.

Legal limits on working hours, rest periods, and break times, as defined by the Arbeitszeitgesetz must be complied with.

Management bears a special responsibility to implement and monitor compliance with these laws and to lead by example. Any breach of these regulations may lead to disciplinary measures and, if necessary, legal consequences.

## **8. Human Rights**

MCE understands that we need to respect the human rights of every individual affected by the Mitsui Chemicals Group's business activities in order to contribute broadly to society and achieve sustainable growth.

The Mitsui Chemicals Group Human Rights Policy applies . This Policy is based on the Guiding Principles on Business and Human Rights adopted by the United Nations Human Rights Council in June 2011 with the aim of fulfilling our responsibility to respect the human rights of every individual affected by our business activities. This Policy can be accessed here:

<https://jp.mitsuichemicals.com/en/sustainability/society/rights/index.htm>

## **9. Prevention of Discrimination**

MCE expects its Business Partners to respect different outlooks on life and cultural or country-specific characteristics when dealing with other Business Partners of MCE, including former Business Partners of MCE, applicants and business partners. MCE strives to provide a workplace and a working environment in which discrimination and sexual harassment are not tolerated, and where everyone has an equal opportunity to work, progress, and contribute to our success. MCE selects, develops, promotes, and compensates Business Partners, including former Business Partners, applicants, and business partners based on objective and comprehensible criteria, without distinction or discrimination because of age, color, national origin, race, religion, gender, physical or mental disability, or any other legally protected personal characteristic.

## **10. Risk Analysis**

MCE conducts a regular risk analysis and immediately will apply countermeasures in case of non-compliance with this Code of Conduct .

## **11. Compliance contacts and Hotlines**

Business Partners may address all concerns to [compliance@mcie.de](mailto:compliance@mcie.de).

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Mitsui Chemicals Europe GmbH

Takeo Okuyama

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