

MITSUBISHI CHEMICAL GROUP EMEA POLICY			
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Mitsubishi Chemical Group **CODE OF CONDUCT**

This Code of Conduct contains our Company's standards of business conduct and ethics. As we lead with innovative solutions to achieve KAITEKI, the well-being of people and the planet, following the values and behaviors of **Our Way**, the Code of Conduct is our guide. It outlines the standards you are expected to uphold as you carry out day-to-day business.

The Code of Conduct reflects the values of Our Way - Integrity, Respect, Bravery, Collaboration, Persistence. The standards of the Code of Conduct naturally inspire a culture where the integrity of each individual and their respect for others, presented through bravery and diverse collaboration to show persistence to stakeholders, can truly be realized. You are responsible for familiarizing yourself and complying with the requirements and guidelines contained in this and other Company policies. How you carry out the standards of the Code of Conduct in conducting day-to-day business matters. Face your daily work following the standards of the Code of Conduct and consistent with the values and behaviors of **Our Way**. "You" or "employee" refers to all employees, workers and contractors employed or engaged by the Company. "Legal & Compliance Department" refers to the Legal & Compliance Departments of Mitsubishi Chemical Group in Japan, the United States, and Europe.

A. Compliance with Company Policies and Procedures

The Company is committed to doing business with integrity, and we expect you to uphold this commitment in all that you do. We depend on our employees to follow the law and to act ethically and responsibly. As a condition of employment/engagement, all employees must comply with Company policies and standards of business conduct, including this Code of Conduct. When in doubt about ethical or legal responsibilities, employees should seek clarification from a supervisor or member of management, or from a member of the Legal & Compliance Department. Violations of Company policy are grounds for disciplinary action up to and including termination.

I. Your Responsibilities

Every Company employee is expected to:

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- * Adhere to KAITEKI principles, including the commitment to Our Way
- * Prioritize safety and doing the right thing while we accomplish work we are proud of
- * Become familiar and be compliant with this Code of Conduct, all applicable laws, and other Company Policies
- * Treat everyone with respect and dignity and in an honest and fair manner
- * Avoid situations where personal interests are, or appear to be, in conflict with Company interests, and disclose any potential conflict to your supervisor
- * Safeguard and properly use Company proprietary information, assets and resources, as well as those entrusted to the Company by other organizations
- * Complete all required training in a timely manner
- * Report suspected wrongdoing
- * Understand that good business ethics requires a standard even higher than applicable law. In considering the ethics of a decision, consider the following:
 - Is it legal?
 - Does it follow Company policies and procedures?
 - Will my colleagues, managers and Company leadership be pleased with my decision?
 - Will I feel proud of my decision and action?
 - Will my family and friends feel proud of my decision and action?
 - Is it the right thing to do?

If you are a manager, in addition to the above, you are expected to promote a culture of ethics and compliance by acting as a model of appropriate conduct. Managers should:

- Confirm that those they supervise understand their responsibilities under the Code of Conduct
- Create an open, collaborative, and trusting environment in which every employee feels comfortable raising concerns and understands the importance of ethics and compliance
- Ensure that employees understand that business results and delivering new value to stakeholders are never more important than ethical conduct and compliance with the law and Company policies – our Company's success and commitment to persistently adhering to our values requires taking ownership and being responsible for the future
- Take corrective or preventive action (in consultation with the Legal & Compliance Department) when there may be a violation of law, the Code of Conduct or Company policy

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- When evaluating employees, consider their conduct in connection with the Code of Conduct principles – both by recognizing them for championing compliance and penalizing them for non-compliance

II. Reporting Wrongdoing

Employees who are aware of actual or suspected misconduct, harassment, illegal activities, fraud, abuse of Company assets, or other violations of law, the standards in this Code of Conduct or other Company policy are expected to report such matters to their supervisor, a member of management or the Legal & Compliance Department immediately.

If you do not feel comfortable with any of these reporting methods, call the Company's Ethics Hotline, a toll-free telephone hotline available to employees 24 hours a day, 7 days a week. Anonymous Hotline phone numbers and a non-anonymous reporting email address can be found at the end of this Code of Conduct.

When you 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 the Mitsubishi Chemical Group in the Region 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.

III. Investigations

Reports are treated very seriously and will be investigated promptly and thoroughly. Maintaining the confidentiality of information relating to an investigation will be given high priority, although a thorough investigation and follow-up by the Company may require certain disclosures, for example, in the course of interviews with the alleged offender, witnesses or other involved parties. If you are involved in an investigation, you are expected to cooperate fully, answer honestly and maintain the confidentiality of any information you may learn in the course of that investigation. Note, however, that nothing in this Code of Conduct precludes you from filing a claim with or disclosing information to any regulatory agency or enforcement entity.

If the Company determines that wrongdoing has taken place, appropriate disciplinary action will be taken.

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IV. Retaliation is Prohibited

The Company is committed to maintaining a culture in which our employees feel comfortable raising good faith concerns about potential wrongdoing without retaliation. The Company will not tolerate any adverse consequences, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination, against an employee who refuses to do something that violates the Code of Conduct, Company policy or law, raises a concern in good faith about potential wrongdoing, or cooperates in an investigation of such potential wrongdoing. Any retaliation, direct or indirect, will be subject to disciplinary action, up to and including termination of employment.

B. Our Relationships with Each Other

Employees are our most valuable resource. It is the policy and practice of the Company to provide all employees with fair and equitable treatment.

I. Valuing Diversity and Equal Opportunity

We respect the rights and cultural differences of all individuals. The Company provides equal opportunities to all employees and applicants for employment in every aspect of employment, including recruitment, hiring, compensation, job assignments and promotion. It is Company policy to treat all employees and applicants for employment without regard to race, color, religion, national origin or heritage, gender (including pregnancy), sexual orientation, gender identity or expression, age, physical or mental disability or any other legally protected status.

II. Discrimination, Harassment and Bullying

The Company is committed to the principle that all employees have the right to be treated with respect and dignity and to work in an environment free of discrimination, harassment and bullying. Such behavior not only may violate laws in your country, but also undermines the stability of our work environment, impacts productivity, and adversely affects employee morale.

We will not tolerate any form of illegal discrimination, harassment or bullying of our employees by anyone, including members of management, co-workers, vendors or customers, on any legally protected basis, including race, color, religion, national origin or heritage, gender (including pregnancy), sexual orientation, gender identity or expression, age, physical or mental disability or any other legally protected status. Comments, slurs,

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jokes or derogatory statements based on any of the preceding are unacceptable and will not be tolerated. If wrongdoing has taken place, appropriate disciplinary action will be taken.

A particularly serious form of workplace harassment is sexual harassment. Conduct constitutes sexual harassment when the submission to the conduct is an explicit or implicit term or condition of employment, the submission to or rejection of the conduct is used as a basis for employment decisions or the conduct has the effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive environment.

Employees who believe that they have been the subject of discrimination, harassment or bullying in the workplace or at a work-related function, have witnessed such behavior or have received a report of such conduct, should immediately report the matter.

III. Drugs and Alcohol

The use, distribution, sale or possession of illegal drugs or any other controlled substance, except when approved by a physician for medical use, is strictly prohibited. Moreover, employees should not be on Company premises or engaged in Company business off-premises while using or under the influence of alcohol, drugs or controlled substances, including marijuana, that may impair performance, whether or not used for medically approved purposes. Employees may consume alcohol on Company premises or while engaged in Company business off-premises, at approved events, in which case moderation and good judgment must be exercised.

IV. Violence in the Workplace

Intimidation, harassment, coercion and other acts or threats of violence that involve or affect employees will not be tolerated. Weapons of any kind are not permitted on Company property (including in employee vehicles parked on Company premises, except as otherwise provided under local law) or at Company functions. Employees should immediately report any threats of violence or concerns that someone may have a weapon in the workplace and activate site emergency plans as warranted.

V. Privacy

We respect the privacy of our employees, customers, and others with whom we conduct business and we are committed to collecting, handling and protecting their personal information in a responsible manner and in accordance with applicable law. "Personal

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Information" includes any information that could be used to identify someone, including direct, business and HR-related information like email or physical address, phone number, name, voice, image and location of an individual, and indirect information, including device identifiers.

Personal Information should be collected only for legitimate business purposes and only in accordance with the purpose for which consent was given (where consent is required), shared only with those who are allowed access, protected in accordance with Company security policies and retained only for as long as necessary. Privacy breaches can happen in many ways, such as possible loss or theft of data due to a lost laptop or other computing equipment or accidentally sending an email or document to the wrong person.

All employees must take appropriate measures to prevent unauthorized access, accidental loss, disclosure or destruction of Personal Information. Employees are expected to comply with the following:

- Secure physical copies and storage areas
- Properly shred and securely destroy unnecessary Personal Information
- Use strong passwords and don't share passwords with anyone
- Use only Company-approved systems and tools for storage, transmission and backup of Company data and do not use personal email, unencrypted or unsecure devices, removable media, personal cloud-based services or unapproved software to conduct Company business.
- When posting information online, do not disclose Personal Information, trade secrets, proprietary or other Company confidential information.
- Do not leave Personal Information at a printer, on a shared server or on a publicly accessible computer or site
- Do not transfer Personal Information between countries without consulting with the Legal & Compliance Department to understand varying data protection standards
- Know the signs of phishing, malware and other cybersecurity threats; recognize efforts to improperly acquire Company information
- Ensure that third parties (e.g., customers, vendors) with access to our Personal Information are contractually obligated to protect it and that we comply with our third-party commitments; consult with the Legal & Compliance Department to review third party contracts for protective privacy language

Report suspected or confirmed privacy and security breaches or vulnerabilities immediately to the Legal & Compliance Department. Some breaches require us to notify the government immediately or be subject to serious penalties, so immediate reporting is essential.

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VI. Freedom of Association

The Company respects local law with respect to employees' rights of association and the right to collective bargaining.

VII. Human Rights, Human Trafficking, Forced or Compulsory Labor, and Child Labor

The Company upholds human rights, including freedom from forced or compulsory labor. The Company also supports the abolition of child labor.

C. Our Relationships with Others

The Company values its relationships with its customers, vendors and consultants or other third-party business partners, and respects the laws governing these relationships. In particular, we are committed to fair and open competition in markets throughout the world. The Company believes that the long-term interests of our customers and employees are best served by complying fully with the antitrust laws, competition laws, anti-bribery laws and other trade regulations of every country in which we do business. The Company does not tolerate and opposes corruption and bribery.

Our relationships with our competitors, customers and vendors are subject to various national laws.

I. Our Competitors

In order to ensure compliance with law and avoid any appearance of impropriety, Company employees are prohibited from entering into any discussions, formal agreements or informal understandings with the Company's competitors concerning the Company's business, absent prior review by the Legal & Compliance Department. This includes discussions as to price, cost, profit, terms of sale, credit arrangements, market share, production volume, sales territories, bidding strategy, customers and methods of distribution. In the eyes of the public, as well as in the courts of law, perceptions can be given more weight than reality -- even innocent contact with our competitors may be viewed as improper. Consequently, any contact or communications with competitors, other than inadvertent and unavoidable casual contacts, should be avoided unless vetted by the Legal & Compliance Department. Should any competitor attempt to discuss the topics above or any sensitive topic, immediately inform the competitor that you will not continue the conversation and report the matter to the Legal & Compliance Department.

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It is Company policy to sell our products on their merits, not by disparaging our competitors or their products or services. Do not make comparisons that unfairly cast a competitor in a bad light. Such conduct only invites disrespect from customers and complaints from competitors which might bear reputational issues and, potentially, financial and legal liability.

II. Our Customers, Suppliers and Consultants

It is Company policy to extend appropriate terms and conditions to each of our customers. The Company endeavors to conduct its business so that customers are treated fairly. When communicating with our customers, stress the advantages of our products. Never make any misrepresentation or dishonest statement. Honesty based on clear communication is at the core of ethical behavior, and the resulting trust is essential to sound, lasting relationships.

In deciding among competing suppliers, weigh all the facts impartially. It is essential that suppliers competing for Company business have confidence in the integrity of our selection process and the Company avoid any appearance of impropriety.

Outside consultants retained by the Company are required to abide by the same code of business conduct as Company employees. It is the responsibility of employees retaining a consultant to make sure the consultant is aware of and complies with our policies.

III. Corruption, Bribes, Gifts and Contributions

The Company does not tolerate and strictly opposes corruption and bribery in our businesses. The Company does not seek business by trying to corrupt the judgment of others and we do not tolerate any corruption or bribery of private or public persons.

The purpose of giving business gifts is to create goodwill for the Company, nothing more. Attempting to improperly influence others by using personal gifts is unacceptable and illegal. Therefore, no one working on behalf of the Company should give gifts with the intention to, or that could be interpreted as, an attempt to improperly influence the recipient in his or her relationship with the Company.

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Payments or gifts of any kind to government or political party officials, or anyone working for or on behalf of a governmental agency, are impermissible, unless approved by the Legal Department and the President of the Company. Such payments or gifts may constitute bribery and may result in criminal prosecution. For further information on this policy, consult the **Anti-Bribery Policy**, your company's specific policy on corporate giving (if applicable) and the Legal & Compliance Department.

You also should not accept gifts that could appear to improperly influence you on behalf of the Company. Remember that appearance is an important consideration.

Decisions to offer or accept gifts of more than nominal value, including meals, entertainment or travel, should be approved in advance by your supervisor (or your company's specific policy, if applicable). It is never permissible to offer the unpaid or discounted use of Company assets, services, facilities or other property without the approval of management.

Employees may not make any contribution of Company funds, property or services to any political party or committee or to any candidate or holder of any political office. No direct or indirect pressure is to be directed toward employees to make any political contribution or participate in the support of a political party or the political candidacy of any individual.

D. Commitment to Safety, Health and the Environment

In line with our guiding KAITEKI principles, the Company regards the health and safety of our employees, customers and neighbors, and the protection of the environment as core values.

In addition to complying with applicable laws and regulations, the Company requires all employees to observe fundamental safety rules and follow safe work practices at all times. All employees must:

- * Follow local company policy and procedures related to safety
- * Immediately advise a supervisor of any incidents, injuries, or illnesses, regardless of severity
- * Know the locations of exits and fire extinguishers near their work area
- * Utilize all applicable personal protection equipment and advise other employees to do the same
- * Know and follow all operating procedures and safety guidelines associated with their job responsibilities

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- * Keep their individual and group work area clean and orderly

The Company's commitment to responsible human safety and environmental management requires each employee's participation in achieving the following goals:

- * Preventing adverse impacts of our operations on the environment, health and safety of our communities
- * Making environmental concerns and conservation of energy and raw materials priority considerations in our operations
- * Reducing, minimizing or eliminating waste generation and emissions at the source; reusing and recycling to minimize the need for disposal; and eliminating environmental incidents, including inadvertent releases, leaks and spills
- * Complying with environmental, health and safety laws and regulations, and cooperating in such matters with all levels of government

E. Financial Integrity, Recordkeeping and Use of Company Assets

All Company financial reports, accounting records, research reports, sales reports, expense accounts, time sheets, maintenance records, logbooks and systems, and other documents must accurately and clearly represent the relevant facts and the true nature of a transaction or activity. Improper or fraudulent documentation or financial reporting are contrary to Company policy and may also be in violation of law. All employees must do their best to ensure that all information entered in business records is legitimate, complete, accurate and consistent with both applicable law and Company policy.

To avoid potentially enabling another person or entity's efforts to evade taxes, ensure that payment for goods or services is always made by and to the entity (person, company, firm) that received or provided the goods or services unless reviewed and approved by the Legal & Compliance Department. If an entity insists on a payment to a third party, promptly report the matter to the Legal & Compliance Department.

Employees shall follow and implement all processes in place to prevent the introduction of illicit funds into the legal economic cycle, or otherwise conceal the source or destination of funds. They shall strive to combat the financing of terrorism and report any incident to the Company, regardless of materiality.

Proper protection and use of Company assets are fundamental responsibilities of each employee. Employees may not use the Company name, equipment, systems, facilities, corporate charge cards, supplies or other assets for personal use or for any use other than

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conducting Company business. Personal items, messages or information that you consider private should not be placed or kept in Company telephone systems, computer systems, offices, plants, work spaces, desks, file cabinets or other Company devices. The Company may monitor or access these areas and materials at any time without notice, in accordance with applicable laws.

F. Company Information and Communications

Company records and confidential information must be managed appropriately to protect our valuable trade secrets and ensure compliance with law.

I. Records Management

The management of Company records is of primary importance. Improper handling of any phase of record management could ultimately prove costly to the Company. Keep in mind that all documents, databases, voice messages, texts, computer documents, emails, files, photos, electronic data are records. Employees have a responsibility to know and follow our **Record Retention Policy**. The Legal & Compliance Department may issue notices regarding records that must be kept in the case of actual or threatened litigation or government investigation. Employees must abide by the directions contained in these notices and not dispose of the applicable information until notified they may do so. Non-compliance could subject the Company and individuals to serious legal and employment-related consequences.

II. Company Proprietary Information

The proper handling and protection of Company proprietary information is crucial to the well-being of the Company. Almost all Company information is confidential information, except information reviewed and approved for public disclosure. Such confidential information includes business, financial and marketing data and strategies; personnel information and salary data; business plans with affiliates and outside companies; and intellectual property, such as technical know-how, processes and unpublished patent applications. Much of this information represents the ideas and efforts of Company employees and licensors and is extremely sensitive, such as unannounced products, research results, marketing strategy, technological advances and customer information. Any unprotected disclosure of Company confidential information may limit or destroy its value.

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Employees are expected to maintain adequate safeguards to prevent the loss or disclosure of Company information. Both during your employment and after leaving the Company, you are prohibited from disclosing Company confidential information, including information you develop, without the Company's authorization. If you need to disclose Company confidential information for legitimate business reasons to consultants, suppliers, customers or others, the recipients should first sign an appropriate Confidentiality Agreement (various versions are available through the Legal & Compliance Department). If you receive a request for information or to conduct an interview from a reporter, third party, attorney or investigator, refer the request to Company management or the Legal & Compliance Department.

Company data transmitted and/or stored electronically requires unique protection. Employees who transmit, receive and/or store electronic data are responsible for compliance with Company policies and procedures relating to information technology, including the Company's information systems policies and procedures and the **Records Retention Policy**.

You are required to return all Company information to the Company at the end of your employment. Your obligations to maintain the confidentiality of Company information continues after the termination of your employment.

The Company treats misuse or theft of its trade secrets or other confidential information as seriously as theft or misuse of any of its other key assets. Contact your supervisor and the Legal & Compliance Department immediately if you have any suspicions of trade secret abuse by current or former employees or by others.

III. Information Owned by Others

It is Company policy to give the same high level of protection to other parties' confidential information as we give to our own. Do not disclose confidential information derived from others if there is any question about its confidential nature. Do not disclose confidential information obtained in the course of previous employment.

If you are on the receiving end of another party's confidential information, you must proceed with caution to prevent any accusations that the Company has misappropriated or misused the information. The receipt of confidential information (whether oral, visual or written) must not take place until the Company and party disclosing the information have formally agreed upon the terms and conditions of its use and executed a written agreement signed by a Company officer or his or her designee. Once another party's confidential or restricted information is properly in your hands, you must familiarize yourself

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with the terms of the confidentiality agreement, and not use, copy, distribute or disclose that information other than in accordance with the terms of the agreement and in furtherance of the designated purpose.

Photocopying, mailing or e-mailing articles or other third-party copyrighted materials, particularly for distribution outside the Company, may be copyright infringement. Contact the Legal & Compliance Department if you want to distribute copyrighted material outside the Company.

IV. Company E-mail, Text and Internet Use

Although our e-mail, text and other internet-based communications often resemble casual communications more than formal business reports, every time you send one of these messages, you have created a business record. Please do not transmit anything via the internet that you would not be comfortable writing in a letter or memorandum. Under certain circumstances, Company e-mail may be obtained by third parties through litigation, even messages marked as deleted.

Be aware that the law generally protects the Company's right to monitor employee e-mail, text messages and Internet use over Company systems. Subject to applicable laws, Company employees have no reasonable expectation of privacy when utilizing Company equipment, such as Company computers, laptops, phones, iPads, and e-mail system. Every employee who has access to a Company device or utilizes a Company system in connection with Company business must be familiar with the Company's information systems' policies and procedures.

Use electronic media properly and legally for Company purposes. Employees must not use Company resources to reproduce, display, distribute, or store materials that violate any party's trademark, copyright, licensing or other intellectual property rights or to violate Company policy or the law.

V. Social Media Use

While the Company respects employee use of social media for personal and professional purposes, employees are responsible for compliance with Company policies when communicating on social media. When using social media, employees should:

- Reveal their relationship with the Company when commenting online on issues related to the Company, and only comment online on behalf of the Company if expressly authorized to do so and if the information is accurate (NOTE: The

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Company's Officers and certain designated individuals serve as official Company spokespersons and employees should not make any statements on behalf of the Company unless authorized to do so)

- In personal postings, clearly state that any opinions they express about the Company are their own and do not reflect those of the Company
- Respect the privacy of others and refrain from publishing photos without proper consent
- Comply with the rules of the social media sites used
- Not disclose confidential business information of or about the Company, its customers, business partners or suppliers, including through photos that may inadvertently reveal confidential information
- Not post anything that is discriminatory, threatening, intimidating, harassing, or bullying

G. Conflicts of Interest

Employees should avoid any situation that may involve (or give the perception it involves) a conflict between their personal interests and the interests of the Company. In dealings with current or potential customers, suppliers, and competitors, employees should act in the best interests of the Company and not for personal advantage. If you believe you have or may have a conflict of interest, you are obligated to make prompt and full disclosure of the situation to your supervisor. A conflict of interest situation might include:

- Any arrangement or circumstance, including family or other personal relationships, that might affect the employee's ability or tendency to act in the best interest of the Company
- Giving or accepting gifts, entertainment, or any personal favor or preferential treatment, beyond token common courtesies usually associated with accepted business practice
- Using Company time and/or resources to pursue personal commercial interests
- Ownership by an employee or an employee's family member of a significant financial interest in any outside enterprise that does or seeks to do business with, or is a competitor of, the Company
- Serving as a director, officer, partner or consultant, or in any other key role, in any outside enterprise that does or seeks to do business with, or is a competitor of, the Company
- Acting as a broker, finder or intermediary for the benefit of a third party in transactions involving the Company or its interests

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H. General Legal Policy

Legal disputes and government investigations must be handled appropriately to protect the Company and its reputation.

I. **Claims, Litigation and Service of Legal Process**

The Company is subject to a wide range of complaints, claims and actions by third parties. Routine, minor customer complaints (where no threat of litigation has been made) should be handled in the ordinary course of business. Always avoid communications that might be misconstrued or used against the Company if the matter becomes contentious. You should immediately refer the following matters to the Legal & Compliance Department for review and appropriate handling:

- Customer complaints that have reached impasse
- Complaints by competitors
- Accusations of wrongdoing
- Threatened or actual lawsuits
- Matters involving an attorney for another party

Legal proceedings should never be initiated without being reviewed in advance by the Legal & Compliance Department, and they are subject to Board of Directors approval in most instances.

The Legal & Compliance Department may issue notices regarding retention of records in the case of actual or threatened legal action. After receiving a litigation hold notice, it is critical that you NOT destroy, or ask anyone else to destroy, any documents (including documents existing only on your computer) that relate in any way to pending, threatened or possible future litigation. Management of the documents should otherwise be in compliance with the document retention policy of the Company.

II. **Governmental Inquiries**

It is Company policy to cooperate with every valid request by a governmental agency. At the same time, the Company is entitled to all the safeguards provided by law for persons under investigation, including representation by counsel. Accordingly, if a government investigator, representative or agent requests an interview with you, seeks information or access to files, or poses written questions, you should politely inform them that the Company will cooperate, but that the Company is represented by legal counsel and, therefore, you must refer the matter to the Legal & Compliance Department. You should then

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immediately inform your supervisor and speak to the Legal & Compliance Department about how to proceed.

As a Company employee, you are required to know and follow this Code of Conduct and other Company policies and to act in line with the values of **Our Way** – Integrity, Respect, Bravery, Collaboration, Persistence - in conducting the Company's business. You are required to know and follow all laws that apply to your job. You are required to complete all required training in a timely manner. If you learn something that suggests that Company policy has been violated, you are expected to report the matter immediately as described above.

A commitment to integrity, honesty and high ethical and legal standards is critical to our continued success as the Mitsubishi Chemical Group leads with innovative solutions to achieve KAITEKI, the well-being of people and the planet. We are counting on you to do your part.

The Code of Conduct is not all-encompassing. Bring any questions or concerns you may have to your supervisor, a member of management, the Legal & Compliance Department or your HR Department.

For information on how to report violations anonymously, refer to the last page.

MITSUBISHI CHEMICAL GROUP EMEA POLICY

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ETHICS HOTLINE COUNTRY-SPECIFIC NUMBERS

Country	Telephone number
Austria	00800 72332255
Bahrain	8004264
Belgium	00800 72332255
Brazil (Portuguese/English)	0800-900-0253
Canada (English or French Canadian)	1-866-842-7139
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)	1- 800-681-6529
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)	1-866-842-7139

OTHER REPORTING OPTIONS
UNITED STATES:

Anonymous online reporting via: <https://www.mycompliancereport.com/report?cid=MCGA>

QR code with the same protections for anonymous reporting

For information on how to report violations anonymously, refer to the last page.

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EMEA: Anonymous online reporting via: www.safecall.co.uk/report

Non-anonymous email reporting at: emea-ethics@mccg.com

For information on how to report violations anonymously, refer to the last page.