

Our Code of Conduct

EMEA Region

MITSUBISHI
CHEMICAL
GROUP

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Message from our CEO

Manabu Chikumoto

Compliance isn't just a word or another set of rules to follow. Compliance can protect and grow a company from a business perspective. It contributes to the strategic governance of the overall organisation and gives current and future customers - as well as investors - confidence.

Safety and compliance are the foundations for ensuring our company's existence. Once a compliance violation occurs, Mitsubishi Chemical's social credibility as a whole will be damaged, and we will lose trust from the market and our customers.

A key purpose of any corporate compliance program is to protect the company and its employees. Knowledge is the first step. Each employee must have a strong awareness and heightened sensitivity not to engage in or overlook acts of misconduct.

Improving communication between leadership and employees will be effective in solving issues or to suggest proposals in the workplace. Once everyone understands the rules of compliance, they can focus on the company's broader goals and help operations run smoothly. Employees who are properly trained on compliance are more likely to recognize and report illegal or unethical activity. It is essential to create a climate within the organisation where employees are able to speak up without hesitation if they notice or have doubts about misconduct.

Ensuring corporate compliance will enable employees to do their jobs, achieve career goals, and keep our customers happy. In return, the company can achieve its goals and grow faster.

Manabu Chikumoto
Chief Executive Officer



> Our Code of Conduct for the EMEA Region represents who we are what we stand for, and how we choose to do business every day.

Across our region, our success is built on a foundation of trust, integrity, and mutual respect. These values are not optional; they are the very essence of our identity and the standard by which our customers, partners, regulators, and colleagues measure us.

Our operating environment across EMEA is diverse and complex, spanning many jurisdictions, cultures, and regulatory frameworks. This Code translates our “Our Way” values - Integrity, Respect, Ownership, Bravery, and Collaboration - into clear, practical guidance that applies wherever we work and whatever our role. It reflects the highest standards of corporate conduct expected in our region and globally, and it brings to life our Group’s KAITEKI philosophy of contributing to the sustainable well-being of people, society, and the planet. To be a KAITEKI Innovation Partner is to unite our scientific heritage with the courage to innovate responsibly and the humility to do so together.

We own this Code and the culture it creates. I ask every colleague to read it, to discuss it openly within teams, and to make it part of daily decision-making. Compliance is a shared responsibility. Thank you for the commitment we each bring to doing business the right way.

Malcolm Kidd

Head of EMEA Region



> I am proud to endorse this Code of Conduct. Compliance is not merely an obligation; it is a source of competitive advantage and a mark of who we are.

Organizations that act with integrity earn trust, attract and retain talent, and build lasting relationships with customers, regulators, and stakeholders. This Code is the cornerstone of that commitment and the practical expression of “Our Way” values.

This Code applies to every employee, manager, and officer across our EMEA operations, and it reflects the standards our customers, suppliers, business partners, and regulators can expect from us. It is designed to be practical, accessible, and relevant to the real situations we face in our work. Whether we sit in a laboratory, a manufacturing plant, a warehouse, or an office, this Code gives us a shared framework for making the right decisions and for living our KAITEKI philosophy - being a KAITEKI Innovation Partner by combining sound judgement with responsible innovation.

I encourage everyone to treat this Code as a living resource. Whenever we are uncertain about a decision, we stop, think, read, ask and act. Our Legal and Compliance departments are here to support us, and our confidential reporting channels are always open to everyone, without fear of retaliation. All of our values are interconnected; ownership and bravery go hand in hand: when we each take responsibility for our conduct and have the courage to speak up, we protect our people, our business, and our reputation. Together, we build a culture of compliance that endures.

Luke Phelan

General Counsel & Chief Compliance Officer



How we live and practice Compliance

This Code of Conduct (the Code) is a practical guide for our everyday decisions. It helps us do the right thing and reminds us what we stand for as a company.

It sets out the basic guidelines for how we behave when conducting business on behalf of Mitsubishi Chemical in EMEA, helping us navigate situations where responsible conduct and ethical decision-making matter most. Above all, it reflects what it means to be a KAITEKI Innovation Partner: honouring our heritage, driving innovation, and working in partnership with one another.

This Code applies to all of us within majority-owned affiliates of Mitsubishi Chemical in EMEA and protects both our people and the company. Every manager is expected to ensure that colleagues know, understand, and follow these standards so that we work harmoniously together. In this Code, “we”, “our”, and “employee” mean all directors, officers, employees, workers, agency staff, apprentices, interns, and contractors of every Mitsubishi Chemical entity in EMEA. Compliance with this Code is a condition of employment or engagement, and a breach may result in disciplinary action up to and including termination of employment or engagement and, where the conduct is also unlawful, referral to the competent authorities.

Our Code and our policies cannot cover every possible situation. When we need to make a work-related decision and we have doubts, we remember to:



The Code is our common guide on how we do business. We consult it often and discuss it with colleagues, together with the policies that develop the topics it covers in further detail.

Before we act, we ask:

- Is it legal, and is it consistent with this Code and our policies?
- Is it safe - for our people, our neighbours, our customers and the environment?
- Is it honest, and would the written record show what actually happened?
- Would I be comfortable if this were reported publicly, or explained to a regulator or an auditor?
- Would I be comfortable if a colleague did the same thing?
- If the answer to any of these is no, or if we are not sure, we stop and we ask.



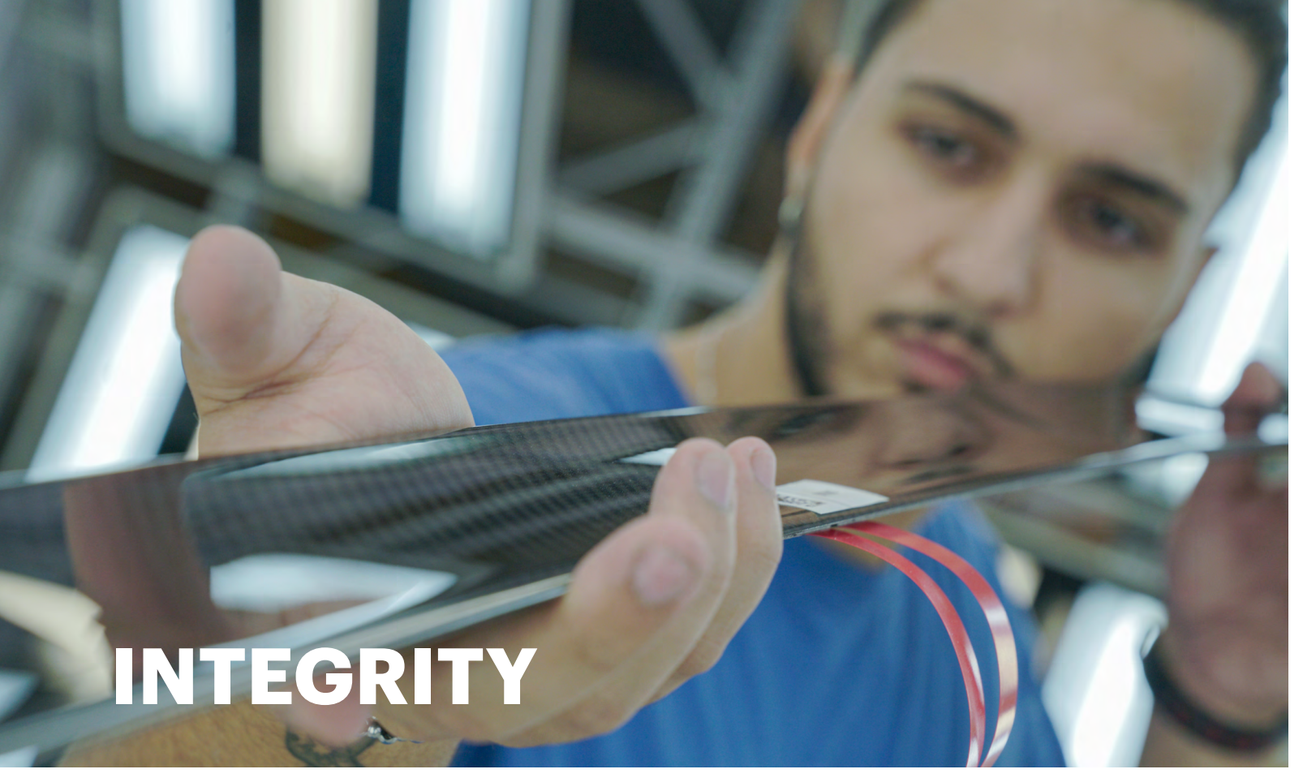
Our Way: What We Stand For

INTEGRITY	WE'RE HONEST, TRANSPARENT, AND ETHICAL - EVEN WHEN NO ONE'S LOOKING.
RESPECT	WE TREAT EVERYONE FAIRLY, VALUE DIFFERENCES, AND LISTEN TO EACH OTHER.
OWNERSHIP	WE ASSUME RESPONSIBILITY FOR OUR ACTIONS, OMISSIONS AND DECISIONS.
BRAVERY	WE SPEAK UP, CHALLENGE WHAT'S WRONG, AND EMBRACE NEW IDEAS.
COLLABORATION	WORKING TOGETHER AND ASKING QUESTIONS IS HOW WE ENSURE COMPLIANCE.

These five interconnected values are what it means to be a KAITEKI Innovation Partner.

KAITEKI represents our heritage, innovation reflects our forward momentum, and partnership reminds us that we achieve more together than alone. KAITEKI is our group's fundamental philosophy: a commitment to creating long-term social, environmental, and economic value for people and the planet, guiding us to act responsibly, think sustainably, and innovate in ways that support society's well-being, today and for generations to come.

Being a KAITEKI Innovation Partner shapes every decision we make. We understand that each choice contributes to our long-term impact on society and carries legal and ethical obligations; we prioritize actions that support environmental and social well-being over short-term gains; we approach challenges with leadership and responsibility, mindful of future generations; and we treat customers, colleagues, suppliers, and communities with the care and respect on which trust depends. The sections that follow show how we live each of our values in practice.



INTEGRITY

INTEGRITY MEANS WE ARE HONEST, TRANSPARENT, AND ETHICAL - EVEN WHEN NO ONE IS LOOKING.

Following Laws and Company Policies

Our Commitment:

We do business the right way by following all applicable laws, regulations, and company policies wherever we operate.

- We know the laws and policies that apply to our role and location, and we ask our manager or the Compliance Department whenever we are unsure.
- We stay up to date with changes to laws and company policies, and we complete all required training promptly.
- We seek guidance proactively when requirements are unclear or overlapping, especially in highly regulated sectors.
- We follow the applicable process and involve the relevant stakeholders in good time to meet all requirements for registration, evaluation, authorisation, and restriction applicable to our products.
- We never ignore the rules or hide errors.

WHAT WOULD YOU DO?

A long-standing customer asks us to follow a local commercial custom that seems to sit awkwardly with a company policy; it is unclear if it breaches the policy, so we pause and seek guidance before proceeding.

Conflicts of Interest

Our Commitment:

We act in the best interests of the company and avoid situations where personal interests interfere - or appear to interfere - with objective business judgement.

- We disclose in writing to our line manager any relationship or external activity that may influence our decisions at work.
- We do not use our position to obtain personal benefits for ourselves, our family, or our friends.
- We remove ourselves from decisions when we cannot remain objective, and we avoid involvement in decisions affecting suppliers or customers with whom we have a personal connection.
- We do not accept personal advantages from third parties that could compromise our impartiality.
- We agree with our line manager, in writing, how any conflict-of-interest risk will be mitigated, and we then implement those mitigation actions.

OUR WAY IS:

We inform our manager in writing that our partner owns and works for a potential supplier, and our manager documents that we will not take part in decisions involving that supplier.

WHAT WOULD YOU DO?

A close friend joins a firm bidding for our contract; we are not the decision-maker but we have some influence, and it is unclear whether to recuse ourselves, so we disclose and ask.

Zero Tolerance for Bribery and Corruption

Our Commitment:

We do not tolerate bribery or corruption in any form, whether in dealings with public officials or private parties.

- We never offer, promise, give, or accept anything of value to influence a business decision, whether directly or indirectly.
- We only offer or accept gifts and hospitality that are reasonable and never intended to sway a decision, and we ask for approval when in doubt.
- We adhere to local laws and our Anti-Bribery Policy.
- We ensure that all direct and indirect interactions with public officials, regulatory authorities, customs agencies, and government-owned entities follow strict transparency and approval requirements.
- We refuse, and never offer or promise, facilitation payments - small unofficial payments to expedite routine actions - even where they are culturally common or requested by third parties acting on our behalf.

WHAT WOULD YOU DO?

A vendor offers to pay for a team dinner during contract negotiations; we politely decline and explain our policy on gifts and hospitality.

Competing Fairly (Antitrust)

Our Commitment:

We compete honestly, fairly, and independently. We do not coordinate prices, output, customers, territories, or technical strategies with competitors. We do not abuse our market power.

- We never share commercially sensitive information - such as pricing, market strategies, or business plans - with competitors.
- We avoid agreements or actions that could limit competition, such as price-fixing, dividing markets, or aligning production output.
- If a discussion with a competitor, distributor, or customer drifts towards sensitive topics such as prices, margins, capacity, allocation, or future strategy, we clearly end the conversation and leave the meeting or call, document what happened (who, when, where, and the topic), and inform the Legal Department as soon as possible.
- We do not discuss commercially sensitive topics - including capacity, costs, production volumes, lead times, raw material sourcing, or customer allocation - with competitors, even informally at conferences, trade associations, or industry events.
- We take part in trade associations and industry events only for legitimate purposes, such as safety, regulation, and standards; competitive topics remain strictly off-limits.

WHAT WOULD YOU DO?

At a trade association meeting a benchmarking survey is proposed that could reveal sensitive cost data; it may be lawful but risky, so we check with Legal before participating.

Insider Trading

Our Commitment:

We do not use confidential or non-public information for personal gain, nor do we allow others to benefit from it.

- We never buy or sell securities on the basis of confidential internal information.
- We do not share sensitive business information with family, friends, or external parties.
- We ask the Compliance Department whenever we are unsure whether information counts as “inside information”.
- We avoid discussing confidential matters in public or unsecured environments.
- We do not recommend or induce anyone else to deal on the basis of inside information, and we do not disclose inside information to anyone - inside or outside the company - other than in the proper course of our duties.
- If we are told that we have been placed on an insider list, or that a closed period applies, we follow the restrictions notified to us and confirm with the Legal Department before dealing in any affected security.

WHAT WOULD YOU DO?

We overhear partial information about a possible transaction and are unsure whether it is ‘inside information’; we ask the Compliance Department before dealing in any affected security.

Anti-Money Laundering

Our Commitment:

We prevent our products, systems, and financial channels from being used for money laundering, terrorism financing, or other illicit activities.

- We verify the identity and legitimacy of our customers, suppliers, and partners.
- We report suspicious transactions, unusual payment structures, or inconsistencies in customer information.
- We do not accept cash payments or indirect payment arrangements without approval.
- We ensure that transactions have a clear commercial justification aligned with the movement of product.
- We comply with all applicable anti-money laundering laws and regulations.

OUR WAY IS:

We stop a sale when a customer’s identity or ownership is unclear.

Political Activity, Lobbying, Charitable Giving, and Sponsorship

Our Commitment:

We take part in public policy debate lawfully and transparently. We do not make political donations, and our charitable giving and sponsorship are never used to obtain or reward a business advantage.

- We do not make or promise any contribution of company funds, property, services, or working time to any political party, committee, candidate, or holder of political office.
- We keep personal political activity entirely separate from our role, and we do not use company resources, premises, branding, or our company title in connection with it.
- We obtain prior approval from the Compliance Department for any charitable donation, sponsorship, or community contribution, and we record it accurately in our books; we never make one that is requested by, directed by, or of benefit to a customer, public official, or other counterparty in connection with a business opportunity.
- We ensure that membership of and participation in trade associations is approved and confined to legitimate purposes.



WHAT WOULD YOU DO?

A public official hints that a permit would be ‘helped along’ by a donation to a local foundation; we report it to Compliance immediately.

WHAT WOULD YOU DO?

A community charity, linked to a customer’s family member, asks for sponsorship. The cause is genuine, but the timing coincides with a tender, so we seek approval and document it.

Keeping Accurate Records

Our Commitment:

We maintain honest, complete, accurate, and up-to-date records.

- We ensure that financial reports, accounting records, research reports, production, regulatory and quality records, sales reports, expense accounts, timesheets, maintenance records, logbooks, systems, and other documents are complete, accurate, correctly dated, and a true representation of the relevant facts and the real nature of a transaction or activity.
- We never falsify or misrepresent information in any company record.
- We identify, store, and retain records for the applicable retention periods, including legal holds.
- We keep records secure and confidential.
- We ensure that production, quality, safety, financial, legal, and regulatory documentation reflects the results and facts accurately and verifiably.

OUR WAY IS:
We refuse to backdate documents, and we do not delete, alter, or destroy records.

External Communications

Our Commitment:

We communicate responsibly, transparently, accurately, and consistently, ensuring that only authorized individuals speak on behalf of the company.

- We do not speak publicly on behalf of the company unless explicitly authorized.
- We ensure that all external communications are complete, accurate, up to date, and not misleading.
- We ensure that any presentation, publication, or participation in conferences is pre-approved when it references the company or its products.
  We do not disclose confidential, sensitive, or proprietary information externally.
- We exercise caution on personal social media accounts, ensuring that personal opinions never appear as company statements.

WHAT WOULD YOU DO?
A journalist contacts us directly for a quick comment on an industry trend; we are knowledgeable but not authorized to speak on behalf of the company, so we refer them to Communications.

> “Being a KAITEKI Innovation Partner means living our story - producing sustainable value for people, society, and the planet. We earn trust through our actions, decisions, and commitment to our values. Lasting partnerships rely on our integrity.”

Fahrettin Dogan
VP - Composite Parts
Advanced Composites & Shapes Domain





RESPECT MEANS WE TREAT EVERYONE FAIRLY, VALUE DIFFERENCES, AND LISTEN TO EACH OTHER.

Respect for Human Rights

Our Commitment:

Protecting human rights is at the heart of how we do business, and we believe every person deserves dignity and respect. As a minimum, we are committed to the Universal Declaration of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. We support the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact, and the OECD Guidelines for Multinational Enterprises.

- We treat everyone fairly, with respect and dignity.
- We ensure safe and healthy working conditions, free from forced, compulsory, or child labour.
- We respect everyone’s right to join, or not to join, organisations, including trade unions, as permitted by law.
- We protect the privacy and dignity of colleagues, customers, and partners in all our interactions.
- We respect the rights of local communities and indigenous peoples and protect the environment, for example by preventing water pollution.
- We carry out the human rights and environmental due diligence required by applicable legislation, including the German Supply Chain Due Diligence Act (LkSG), the EU Corporate Sustainability Due Diligence Directive as transposed, and the UK Modern Slavery Act 2015.

OUR WAY IS:
We raise concerns when a supplier’s site shows signs of unsafe or forced-labor conditions.

Treating Others with Respect

Our Commitment:

We believe in a workplace where everyone feels respected, valued, and included.

- We are inclusive and treat everyone fairly, with respect and dignity. We do not tolerate discrimination of any kind – including jokes, comments, actions, or omissions, on any legally protected ground, such as race, color, religion, national origin or heritage, gender (including pregnancy), sexual orientation, gender identity or expression, age, or physical or mental disability
- We never engage in or ignore harassment, bullying, abuse, violence, or the threat of violence, whether verbal, psychological, or physical; sexual harassment is a particularly serious form of harassment.
- We provide equal opportunities to all employees and applicants in every aspect of employment, including recruitment, hiring, pay, job assignments, and promotion.

WHAT WOULD YOU DO?

A colleague's repeated jokes upsets one team member but is intended lightly; it is unclear if it crosses a line, so we address it respectfully and seek HR guidance if needed.

Protecting Data Privacy

Our Commitment:

We safeguard personal and confidential information.

- We comply with the EU General Data Protection Regulation (Regulation (EU) 2016/679), the UK GDPR and Data Protection Act 2018, and equivalent national laws across the EMEA region, together with the company's Data Protection Policies; we maintain records of processing activities and complete a data protection impact assessment where one is required.
- We use only approved systems for storing and sharing data, and we do not use personal devices or unapproved apps for company business. We report any suspected data breach immediately.
- We only collect or share personal data for legitimate business reasons, on a valid lawful basis under applicable data protection law, and we use it only for the purposes notified to the individual. We limit access to personal or confidential information strictly to those who need it for legitimate business purposes.
- We ensure that data processing, transfers, and storage comply with all relevant regulations, recognizing that additional rules apply when data crosses borders. We put appropriate Data Transfer Agreements (such as Standard Contractual Clauses) in place for international transfers or third-party processing, and we conduct third-party data-protection risk assessments before sharing data.
- When we use artificial intelligence tools or automated decision-making systems, we ensure that personal data is processed lawfully, that meaningful human oversight is maintained, and that the use is permitted under the company's policies and the EU AI Act where it applies; we never input confidential, proprietary, or personal data into an unapproved AI tool.

OUR WAY IS:

We restrict HR data access to authorized staff only, using appropriate security measures.

> "Our long-term success depends on the trust of each other, our customers, business partners, regulators, and the communities we serve. Our Code of Conduct sets out the commitments that guide how we act, helping us make ethical decisions, uphold our values, and conduct business responsibly."

Thomas Hehl
Director Polyester Films EMEA





OWNERSHIP

OWNERSHIP MEANS WE ASSUME RESPONSIBILITY FOR OUR ACTIONS, OMISSIONS, AND DECISIONS.

Taking Ownership

Our Commitment:

We take responsibility for our actions and decisions.

- We lead by example; we expect leaders to communicate and act in a compliant way, especially when it is difficult.
- If we make an error, we acknowledge it quickly and help to resolve it.
- We anticipate safety, data privacy, cybersecurity, and compliance risks rather than waiting for audits or customer questions to surface them.
- We follow through on corrective actions and verify that improvements are fully implemented and documented.
- We take pride in our contributions and are accountable for the results.
- We identify, assess, manage and communicate risks within our area of responsibility. We escalate significant risks promptly and implement appropriate controls to reduce the likelihood and impact of adverse events.
- We ensure proper independence of control functions for the performance of their duties.

WHAT WOULD YOU DO?

We notice a small process gap that is not yet causing problems; it is unclear whether to escalate now, so we raise it proactively rather than wait for an audit.

If we lead a team, more is expected of us:

- We set the example. What we tolerate becomes the standard, whatever the Code says.
- We make sure the people who report to us know this Code, have completed their training, and know how to raise a concern.
- We never ask anyone, and never allow anyone, to cut a corner on safety, quality or compliance to meet a target, a deadline or a budget - and we make sure our teams know that no target justifies it.
- When a compliance report is brought to us, we take it seriously, we record it, and we pass it to the Compliance Department.
- We do not investigate a compliance report independently, and we never discourage, delay or filter a report.
- We protect the person who raised a compliance report.



Safety

Our Commitment:

We are committed to the highest standards of safety, protecting employees, contractors, customers, communities, and visitors through responsible operations and risk prevention.

- We sustain safety by ensuring safe facilities, procedures and ways of working as well as adopting a personal safety approach.
- We adopt a risk management approach based on risk elimination and when needed risk control.
- We do not start up, restart, or continue to operate outside approved safe operating limits, however commercially inconvenient the delay.
- We follow management of change, permit to work, and isolation procedures without exception.
- We report every loss of containment, however minor, and every process near miss, and we treat learning from them as more important than explaining them.
- We immediately report unsafe conditions, near misses, and equipment malfunctions.
- We stop working where a situation appears unsafe, even if this causes operational delay.
- We take part in required safety training and maintain a safety-first mindset.
- We do not work under the influence of alcohol or drugs, and we do not use, distribute, sell, or possess illegal drugs or controlled substances.

WHAT WOULD YOU DO?

A machine behaves oddly but still runs, and stopping it will delay a shipment; unsure if it is truly unsafe, we stop and report rather than risk it.

> “Everybody, home safe, every day”

Graham Hill
MCE EHS and Operation Improvement



Protecting Corporate Assets, including Intellectual Property

Our Commitment:

We safeguard all company assets - physical, financial, digital, and intellectual - so that they are used responsibly and protected from loss, theft, or misuse.

- We use company assets, such as equipment, funds, technology, and facilities, only for legitimate business purposes.
- We take care of physical assets and report damage, loss, or theft immediately.
- We protect digital assets by using strong passwords, following IT security protocols, never sharing access credentials, and using only approved artificial intelligence tools in line with company guidance.
- We respect intellectual property and do not copy, share, or use the company’s or a third party’s inventions, patents, trademarks, or copyrighted materials without permission.
- We safeguard company know-how and trade secrets and never disclose them outside the company unless this is authorized, and appropriate protective measures are in place.
- We protect non-public information about our customers, suppliers, and partners. We protect confidential information entrusted to us by customers, suppliers, and other third parties to the same standard as our own, and we do not accept, use, or bring in confidential information belonging to a former employer or any other party unless approved.
- Our confidentiality obligations continue after our employment or engagement ends, and we return all company information, devices, and equipment on departure.

OUR WAY IS:

We never share access credentials, and we use only approved AI tools in line with company guidance.

WHAT WOULD YOU DO?

A new online tool would speed up our work, but its data terms are unclear; we check with IT before using it for company information.



Product Quality

Our Commitment:

We deliver products and services that meet regulatory, safety, and quality standards.

- We ensure our work meets company, regulatory, and contractual standards for quality and safety.
- We suggest ways to improve quality and safety.
- We follow approved raw-material certifications, formulations, recipes, work instructions, and process parameters without deviation.
- We ensure that all required quality documentation - such as certificates of analysis, specifications, batch records, and regulatory declarations - is complete, accurate, and maintained so that customers and regulators can rely on our data.
- We meet and document strict quality and performance requirements for our products.

OUR WAY IS:

We report test failures instead of retesting until results ‘look good.’

Product Stewardship and Responsible Care

Our Commitment:

We take responsibility for the safety of our products across their whole life cycle - from research and raw-material selection, through manufacture, transport, and use, to disposal and recycling- consistent with the Responsible Care® Global Charter.

- We ensure that substances and mixtures are correctly registered, classified, labelled, and packaged under REACH, CLP/GHS, and equivalent national chemicals legislation before they are placed on the market.
- We speak up immediately if we spot a problem or concern with product safety.
- We continuously assess product risks throughout the product life cycle and take action when new information becomes available.
- We provide customers and downstream users with accurate and current Safety Data Sheets and handling information, and we respond promptly to substance-related enquiries.
- We investigate customer complaints, product incidents and product safety concerns promptly and take appropriate corrective actions.
- We assess the hazards and risks of new products, new applications, and process changes before proceeding, and we escalate where an intended use falls outside the assessed scope.



- We apply the company's requirements on responsible mineral sourcing and on products intended for medical, food-contact, aerospace, or defence applications.

WHAT WOULD YOU DO?

A customer asks to buy a product for an application it has not been assessed or registered for; we refer the request to Product Stewardship and Legal before accepting the order.

Environmental Responsibility and Sustainability

Our Commitment:

We strive to minimize our environmental impact and support sustainability, reflecting our KAITEKI responsibility to future generations.

- We adhere to safety and environmental laws and policies in our daily work.
- We look for ways to reduce, reuse and recycle waste.
- We take part in company sustainability programmes, implement the required controls, and suggest improvements.
- We ensure that waste, emissions, and chemical-handling practices meet or exceed regulatory standards and internal procedures.
- We prioritize in the selection of materials, processes and suppliers that help reducing environmental footprint across the product life cycle (Cradle to gate).
- We immediately report environmental incidents, permit exceedances, spills and releases and participate in investigations to prevent recurrence.

WHAT WOULD YOU DO?

A cheaper supplier has a weaker environmental footprint; unsure how to weigh cost against our KAITEKI commitments, we raise it for a sustainability assessment.

Export Control

Our Commitment:

We comply with all export control laws and regulations.

- Where our work involves moving products, technology, or information across borders, we understand the restrictions and verify licences and sanctioned parties before transferring products, technology, or technical data.
- When in doubt, we ask the Export Control or Legal Departments before shipping or sharing information internationally.
- We comply with all applicable sanctions and restrictive measures, including EU, UK, US, and UN regimes; we screen counterparties and intermediaries against the applicable lists before entering into or performing any transaction, and we escalate any possible sanctions exposure to the Export Control or Legal Departments before proceeding.
- We do not share controlled technical information - including R&D data, specifications, formulations, process parameters, or software - with colleagues, distributors, customers, or partners in other countries without verifying export control permissions.
- We screen and approve all customers and end-users - especially those in high-risk sectors such as defence, aerospace, and semiconductors - and keep records before accepting orders or providing technical support.
- We follow internal procedures for export documentation, product classification, licence applications, dual-use evaluations, and record-keeping to ensure traceability and regulatory compliance.

OUR WAY IS:

Before sharing technical information with a colleague across borders, we verify that export control requirements are met.

Working with Third Parties and the Supply Chain

Our Commitment:

We work only with trusted third parties that operate ethically, responsibly, and in compliance with applicable laws and industry standards.

- We conduct due diligence before engaging suppliers, distributors, agents, and contractors, and we continue to do so during the engagement.
- We ensure that third parties comply with export control, anti-bribery, safety, anti-money laundering, and quality requirements.
- We monitor third-party performance and raise concerns if behaviour deviates from expectations.
- We never use third parties to carry out actions that the company itself is prohibited from performing.
- We immediately report any red flags, such as unusual payment requests, a lack of transparency, or a refusal to provide documentation.
- We cooperate fully and lawfully with authorities and with regulatory or governmental investigations concerning our third parties, in coordination with the Legal Department.

WHAT WOULD YOU DO?

An agent refuses to provide certain documentation, citing local practice; unsure if this is a genuine barrier or a red flag, we pause onboarding and consult legal.

Governmental Inquiries

Our Commitment:

We cooperate professionally and transparently with authorities, while protecting our legal rights through the proper channels.

- We provide complete, clear, and current information to authorities in line with legal requirements and our rights.
- We refer the matter to the Legal Department as soon as possible, following the applicable procedures, in the case of unannounced inspections (dawn raids).
- We cooperate with authorities' information requests, access to files, and written questions, with the support of the Legal Department.
- We do not destroy any document, email, or other source of information, even if we find it incriminating.
- We do not volunteer additional information or answer questions outside our direct personal knowledge or unrelated to the inspection.

OUR WAY IS:
An inspector asks for documents that may be privileged; unsure what we must hand over, we involve Legal before responding.

Understanding and Applying this Code

Our Commitment:

This Code is owned, maintained, and enforced by the Compliance Department. It sits at the head of our EMEA governance framework and is supported by internal policies.

- We complete the Code of Conduct training and attestation assigned to us by the deadline set; attestation is mandatory for all personnel and is retained as auditable evidence.
- We understand that a breach of this Code may result in disciplinary action up to and including dismissal and may also give rise to personal civil or criminal liability.
- Where this Code differs from a Global Governance Document of Mitsubishi Chemical, the Global Governance Document prevails unless local law requires otherwise; where local law is stricter than this Code, we follow local law and inform the Legal Department.
- No provision of this Code may be waived, and no exception granted, other than in writing by the General Counsel and Chief Compliance Officer, EMEA; any waiver in favour of a director or officer requires approval by the Regional Management Board and is recorded in the Governance Document Register.
- This Code is owned by the General Counsel and Chief Compliance Officer EMEA. The Code is to be reviewed at least every 24 months, the English version prevails, save where local law requires otherwise.

OUR WAY IS:
When asked to follow a local practice that conflicts with the Code, we do not proceed, and we raise it with Legal so the conflict can be assessed.



BRAVERY MEANS WE SPEAK UP, CHALLENGE WHAT IS WRONG, AND EMBRACE NEW IDEAS.

Speaking Up and Reporting Potential Violations

Our Commitment:

We encourage everyone to speak up and to challenge what is wrong.

- We speak up quickly if something feels wrong and report it, even when it is uncomfortable.
- We suggest improvements and question practices that do not align with our values.
- We use our confidential reporting channels, including hotlines, web portals, or directly contact the Compliance Department, or report anonymously if preferred.
- We prohibit retaliation against anyone who raises a concern in good faith, believing the information to be true at the time of reporting. Retaliation may itself lead to disciplinary action.
- Retaliation is prohibited whether or not a concern is ultimately substantiated, and this protection extends to witnesses, to those who assist an investigation, and to those who report to a competent external authority.
- Nothing in this Code, and no contract, settlement, or other company policy, prevents anyone from reporting to or cooperating with a regulator, law enforcement body, works council, or employee representative.
- Potential violations raised through our reporting channels are assessed and managed under the applicable company procedures, taking into account its nature, the country involved, and any applicable legal requirements.

OUR WAY IS:
When we witness a colleague being pressured to cut corners on a compliance check, we report it even though the colleague is senior to us.

WHAT WOULD YOU DO?
We have a nagging feeling that something is 'off' but no firm evidence; unsure whether it is worth reporting, we raise it in good faith and let the process assess it.



COLLABORATION

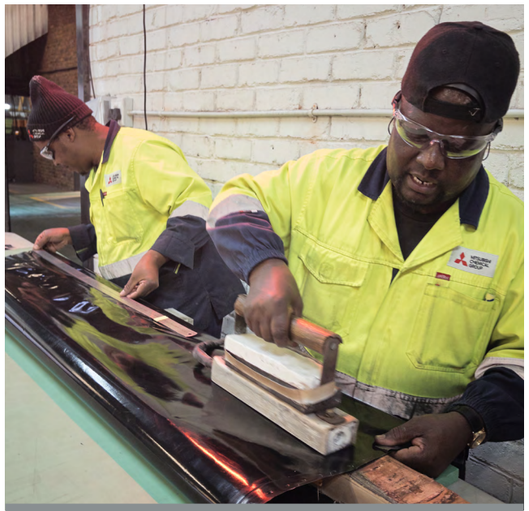
COLLABORATION MEANS WORKING TOGETHER AND ASKING QUESTIONS - THIS IS HOW WE ENSURE COMPLIANCE.

Working Together

Our Commitment:

We believe success is a team effort, and connecting with colleagues from other departments supports sound assessments and timely decisions.

- We communicate openly and share knowledge and information with colleagues.
- We provide colleagues with complete, accurate, and up-to-date information in good time so that they can perform their roles.
- We escalate cross-functional issues rather than working in silos when customer or regulatory requirements overlap.
- We offer help, feedback, and encouragement, especially when challenges arise, and we recognize team achievements and learn from setbacks together.
- We share relevant compliance, safety, and regulatory information with teammates to prevent misunderstandings and risks.



OUR WAY IS:
When a colleague in another region faces a compliance question we have solved before, we proactively share our experience and documentation.

Working Towards Compliance

Our Commitment:

We build a strong compliance culture, continuously and together. Leaders set the tone through their actions, and each of us follows the rules and supports a compliant working environment.

- We demonstrate integrity in everyday decisions, knowing that our conduct sets the standard for the team.
- We complete training promptly and encourage colleagues to do the same.
- We involve other functions when decisions have regulatory, safety, legal, or compliance implications, so that compliance is considered from every perspective.
- We identify areas where new internal governance or training would support compliant behaviour.
- We support colleagues when challenges arise and contribute to practical solutions.

OUR WAY IS:
We build compliance check-ins into project timelines from the start, rather than treating them as an afterthought before launch.

> “The EMEA Code of Conduct is more than a compliance framework. It reflects who we are as an organisation, how we work together, and the behaviours that define us.”
>
> **Marie Meyer**
> Chief HR Officer EMEA





DOES SOMETHING CONCERN YOU? SPEAK UP.

IF YOU BECOME AWARE OF ACTUAL OR POTENTIAL MISCONDUCT, OR IF SOMETHING DOES NOT SEEM RIGHT, SPEAK UP. YOU MAY RAISE A CONCERN OR MAKE A REPORT AT ANY TIME, ANONYMOUSLY OR ON A NAMED BASIS AND IN YOUR PREFERRED LANGUAGE. YOU DO NOT NEED TO HAVE COMPLETE EVIDENCE. A REASONABLE CONCERN RAISED IN GOOD FAITH IS SUFFICIENT.

I. What is Reporting?

Reporting means communicating information about actual or potential misconduct.

Some reports also qualify as whistleblowing under the Whistleblower Directive[1] or applicable national law.

Mitsubishi Chemical does not tolerate retaliation against anyone who raises a concern or makes a report in good faith.

II. Who can make a report?

Anyone can make a report. This includes, for example:

- employees, including those whose employment relationship has already ended;
- job applicants, trainees and temporary workers; suppliers, business partners and their employees;
- self-employed persons providing services, freelancers, contractors, subcontractors and suppliers;
- business partners and their employees;
- shareholders and members of governing bodies;
- third parties, such as suppliers, consultants, distributors or customers.

III. What can be reported?

Reports may concern actual or potential breaches of applicable laws, company policies or ethical standards, including reasonable suspicions and attempts to conceal such breaches.

IV. How can a report be made?

You may use any of the following reporting channels:

- **Safecall**, an independent third-party platform through which reports may be made orally or in writing, in your preferred language and, at your choice, anonymously, semi-anonymously or on a named basis. Semi-anonymous means that Safecall knows your identity but does not disclose it to Mitsubishi Chemical;
- any member of the Compliance Department, including through a direct conversation or an in-person meeting;
- your direct supervisor, relevant manager or local HR department[2];
- the EMEA Ethics mailbox at **emea-ethics@mcgc.com**[2].

In accordance with the EMEA Compliance Program Policy, **any MCG EMEA Personnel who receives a report of potential misconduct must immediately inform the Chief Compliance Officer.**

Local Safecall telephone numbers and the online reporting platform are available through the QR code provided in this document. Contact details for the Compliance Department are available on the intranet.

V. What happens after a report is made?

Reports are assessed taking into account the nature of the matter, the country concerned and the applicable legal requirements.

For reports within the scope of applicable whistleblowing law, you will receive an acknowledgement within seven days and feedback on the follow-up within three months, unless different timeframes apply under national law. Other reports are handled under the applicable company procedures.

You may request an in-person or video conference meeting. Any such meeting will be arranged within the timeframe required by applicable law.

In addition, you have the option of submitting your report through the external reporting channels of the competent authorities.

VI. How are persons who report protected?

We prohibit retaliation against anyone who raises a concern in good faith, believing the information to be true at the time of reporting. Retaliation may itself lead to disciplinary action.

The Compliance Department will ensure that persons who raise a concern in good faith are protected from any form of retaliation, such as:

- termination of employment or engagement;
- denial of promotion;
- salary reduction;
- bullying;
- discrimination;
- harm through social media;
- withdrawal of a licence or permit;
- negative performance appraisal, among others.

Retaliation is prohibited whether or not a concern is ultimately substantiated, and this protection extends to witnesses, to those who assist an investigation, and to those who report to a competent external authority.

Reports are handled confidentially and in accordance with applicable law and company procedures.

The Compliance Department will take the necessary steps to avoid conflicts of interest while conducting investigations.

Our reporting channel may be reached via toll free calls (you may find the local toll free phone number at: **https://www.safecall.co.uk/file-a-report/telephone-numbers/)** or accessed at: **https://www.safecall.co.uk/clients/mcc-emea/** or through this QR code.

Building a strong compliance culture is a team effort. If you have questions or suggestions, you may contact the Compliance Department at **emea-ethics@mcgc.com**

Notes

[1] Directive (EU) 2019/1937 on the protection of persons who report breaches of European Union law.

[2] For MCG affiliates in Italy, these are not channels for receiving whistleblowing reports.



MITSUBISHI CHEMICAL GROUP