

This **Code of Conduct** is based on the **Daicel Group Code of Conduct** and clearly defines the code for carrying out corporate affairs for everyone working at TOPAS Advanced Polymers. It is not just a matter of having a thorough understanding of the Code of Conduct. Each and everyone of us shall actively put this Code into practice in our own everyday activities to create an even more favorable atmosphere within the Company and to create a company that gains and deserves society's trust.

Daicel Group has implemented a [Sustainable Management Policy](#) that is deeply rooted in one of our founding principles of co-creating value to achieve a better quality of life for all. Our objective is to contribute to the sustainable development of society. As part of the policy implementation, **all Daicel group employees**, including executives, have committed to follow the "Daicel Group Code of Conduct," a set of guidelines highlighting acceptable and expected ethical behavior.

In order to survive in an increasingly diverse global society, we establish group ethical norms that universally apply to all areas of corporate activity.

By committing to these policies and applying them in our daily business practices, our employees consistently conduct business with strong morals, integrity, and the highest standards of ethics. These efforts demonstrate Daicel's good corporate citizenship and integrity.

1. We conduct ourselves with strong moral and ethical standards.
2. We treat others with dignity and respect.
3. Though we have independent thoughts and actions, we collaborate to achieve optimal result as necessary.
4. We create a "future of promise" for all by embracing new perspectives, adopting a mindset of change, and embracing the spirit of challenge.
5. We proactively engage with individuals beyond our organization, fostering new benefits by promoting open partnerships with diverse companies and entities.
6. We recognize that safety, quality, and compliance are the pillars of the manufacturing industry. Therefore, we prioritize them in our daily operations, continually striving to meet the expectations and earn the trust of our customers and society.

Our Ethical Standards of Daicel Group

The following Code of Conduct applies to all employees of Daicel Group companies, including our supply chains.

(1) Fair and transparent business activities

- i. Compliance with laws (legal rules, regulations, ordinances, etc.), company policies and procedures.**
We are committed to domestic and international legal and regulatory compliance, as well as company policies and procedures.
- ii. Fair business practices**
We practice fair business and competition. We do not participate in unfair or anti-competitive business practices, including collusion, cartels, and bid rigging.
- iii. Compliance with contract terms and customer requirements**
We prioritize compliance with customers/suppliers terms and conditions set forth in an executed contract. If a new term or condition arises that is not explicitly defined in the contract, we will clearly communicate the new term to all contracting parties once it has been mutually agreed upon.
- iv. Fair accounting**
We conduct fair accounting and tax practices based on accurate records.
- v. Responsible procurement**
We strictly prohibit inappropriate transactions, including the abuse of a dominant bargaining position, in our commitment to upholding fair business practices. We exercise thorough due diligence in supplier selection to ensure that only those who align with our social and ethical standards, such as environmental conservation and human rights protection, become part of our supply chain.
- vi. Information management**
We commit to the safeguarding of our company's and third parties' confidential information, including personal data, by maintaining an effective information security system. We adhere to privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
- vii. Ban on insider trading**
Insider trading is prohibited, and we handle crucial undisclosed information in the utmost responsible and appropriate manner.
- viii. Protection of intellectual property**
We carefully safeguard the Group's intellectual property rights and prohibit any actions that would infringe upon the rights of others.
- ix. Disclosure of information**
We disclose accurate corporate information, taking into consideration the interests of various stakeholders, including shareholders, in a timely, appropriate, and fair manner. In addition, we conduct suitable dialogues according to the needs of each stakeholder.

x. Partnership with nonprofit and non-government organizations (NPOs/NGOs)

Our corporate-nonprofit partnerships have generated positive impacts on various social and environmental issues. We remain dedicated to seeking contribution opportunities to organizations that are committed to addressing pressing challenges faced by our communities today. We collaborate with NPOs and NGOs that offer innovative and comprehensive solutions to these issues, with the aim of making a meaningful and sustainable difference in society.

xi. Proper relationships with politics

We maintain a suitable and transparent relationship with politics, based on legal regulations.

xii. Prohibition of corruption and engagement with antisocial forces

We have no affiliation with any criminal syndicates or organized crime groups. Corrupt practices such as bribery, embezzlement, and money laundering are strictly prohibited.

xiii. Sensible course of action

We clearly distinguish between public and private matters and do not misuse company assets or expenses for personal purposes. Giving or receiving gifts or favors that exceed commonly accepted social norms is not allowed.

xiv. Transparent and healthy work environment

We operate in an open work environment that is transparent and discourages secrecy, where common daily activities include communication and collaboration, consultation, and timely reporting of any potential issues.

Our principle of "Bad News First" also promotes transparency and discourages employees from committing fraud or participating in cover-ups.

xv. Whistleblower protection and non-retaliation

We established internal and external channels for whistleblowers to securely report any violations of laws or the Code of Conduct. These channels are equipped to maintain the confidentiality, anonymity, and protection of whistleblowers, unless prohibited by law.

Any form of sanctions or retaliation against whistleblowers is strictly forbidden.

(2) Respect for all individuals and maintaining a healthy and positive work environment.

i. Respect for human rights

We believe all humans, regardless of race, sex, nationality, ethnicity, language, religion, or any other status, are entitled to all human rights outlined in the United Nations Universal Declaration of Human Rights, and we are committed to treat all workers with dignity and respect

ii. Respect for diversity and prohibition of discrimination and harassment

We are committed to providing a work environment that is free of harassment and unlawful discrimination, such as race, ethnicity or national origin, color, age, gender, sexual orientation, gender identity and expression, disability, pregnancy, and religion. This commitment extends to all aspects of employment, including hiring, wages, promotions, and access to training opportunities.

iii. Prohibition of forced labor and child labor

We prohibit employment of any forced labor or child labor.

iv. Freedom of association and collective bargaining rights

We respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly, in conformance with local law.

v. Occupational safety and health management

We continuously identify, assess, and mitigate employees' potential exposure to health and safety hazards. Workers are to be provided with appropriate, well-maintained, personal protective equipment where necessary, as well as ongoing occupational health and safety training. We also strive to develop and improve the mental and physical well-being of all Daicel Group employees.

vi. Human resources development initiatives

We believe that people are the driving force behind all business activities. Thus, our human resources development initiatives are aimed to enhance employee skills, knowledge, capabilities and promote professional growth in alignment with Daicel's values and goals.

vii. Work-life balance

We recognize the importance of maintaining a healthy equilibrium between work responsibilities, personal well-being, and privacy of individuals. We encourage employees to set and maintain appropriate boundaries between work and personal life, which include respecting non-working hours and setting adequate time for rest, relaxation, and personal commitments.

(3) Sustainability, environmental conservation, and social responsibility

i. Product functionality, quality, and excellence

We manufacture and deliver high quality products that are functional and align with customer expectations. We consistently review and improve our production methods to meet quality standards with ongoing goals to exceed customer expectations and improve customer satisfaction.

ii. Environmentally friendly and socially conscious production processes

We continuously identify the environmental impacts and strive to minimize adverse effects on the community, environment, and natural resources within our manufacturing operations, while safeguarding the health and safety of the public. We've developed technologies to drive innovation in new production processes that minimize environmental impact and reduce energy consumption. Furthermore, we actively contribute to the

establishment of a circular economy, promoting the efficient use of resources and minimizing waste.

iii. Safe handling of chemicals

We comply with relevant laws, regulations, and industry standards for the safe handling, storage, transportation, and disposal of chemicals. This ensures that employees are aware of and adhere to legal requirements to minimize risks to human health and the environment, including leakage.

iv. Emergency preparedness and disaster prevention

As a chemical plant, we place great emphasis on establishing and maintaining a robust safety and disaster prevention system to prepare for natural disasters, such as earthquakes and typhoons. We continuously improve this prevention system through education and training programs, including emergency drills. By equipping our workforce with the necessary knowledge and skills, we strive to always operate safely and minimize harm to life, the environment, and property in an emergency or event of natural disasters.

v. Contribution to local communities

Engaging with local communities is essential to being responsible corporate citizens. Daicel builds relationships with various local communities to understand their needs and priorities, to collaborate with community members and organizations, to help align our contributions with the communities' specific needs, and to foster meaningful partnerships that drive positive change.

This document is electronically signed.

TOPAS Advanced Polymers GmbH

Date: 30.01.2025

Bommel, Gregor

Managing Director

Date: 30.01.2025

Kauertz, Frank

Managing Director