NICHINO EUROPE CO., LTD.

Supplier Code of Conduct - Nichino Europe Co. Ltd

Nichino Europe Co. Ltd (Nichino) recognises its responsibilities as a corporate entity whose business operates in multiple countries, jurisdictions, territories and communities, to uphold high ethical, social, corporate and environmental standards.

We are part of a large global supply chain for the products we research, develop, manufacture and supply to end users. We acknowledge as part of the supply chain we can effect changes to create and maintain good environmental, social and governance standards (ESG). This Supplier Code of Conduct is designed to set out our expectations of our suppliers to uphold our ESG values.

Our principal expectation is that our suppliers uphold all laws and adhere to all guidance that affect their supply to us and our customers. This includes laws related to:

- Health and Safety
- Use of forced labour
- Working conditions for employees and workers
- Child labour
- Bribery and corruption
- Environmental degregation
- Discrimination
- Unethical business practices
- Sustainability
- Money laundering
- Anti-trust/competition
- Data security and privacy

All suppliers are expected to have regard to and comply with:

- 1. The United Nations Guiding Principles on Business and Human Rights
- 2. The International Labour Organization, Declaration on Fundamental Principles
- 3. Rights at Work, and the global chemical industry's Responsible Care® program

Force

Nichino considers compliance with this Supplier Code of Conduct a condition of its contractual relationships with its suppliers. Where suppliers are in breach of this code Nichino is entitled to end its relationship with them, without notice.

Nichino may require suppliers to provide evidence of compliance with this code. Failure to provide satisfactory evidence will be a breach of the code.

Suppliers accept and acknowledge that Nichino may audit their processes and premises to ensure that this code is being adhered to.

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Environment

All suppliers agree to comply with the following statements: No supply shall be:

- Derived from raw materials that have been extracted in contravention of local or international laws
- The cause of unnecessary or illegal damage or destruction to the environment
- The cause of adversity to the local community where the extraction takes place

Social

All suppliers agree to comply with the following statements: No supply shall have been made:

- By workers
 - being forced to work in contravention of local or international laws which prohibit forced labour and trafficking of workers
 - whose rights have not been upheld. Such rights include but are not limited to freedom of association, minimum wages, maximum working hours, breaks for rest and sustenance, provision of adequate working and living conditions, freedom from inhumane treatment and discrimination
- Without regard to
 - the impact of the supply on the social cohesion and community from which it is derived
 - Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (contribution to armed conflict)

Governance

All suppliers will comply with Nichino's policies on:

- Anti-Bribery and Corruption
- Ethical Business
- Whistleblowing

These policies are available on Nichino's website

All suppliers must implement:

- Corporate Governance procedures
- Risk management measures including for cyber and terrorism
- Compliance protocols
- Data and privacy protection policies