NICHINO EUROPE CO., LTD.

Supplier Code of Conduct – Nichino Europe Co. Ltd

Nichino Europe Co. Ltd (Nichino) recognises its responsibilities as a corporate entity operating across multiple countries, jurisdictions, territories and communities. We are committed to conducting business lawfully, ethically and responsibly and to respecting internationally recognised human rights, labour standards and environmental protections.

We are part of a global supply chain for the products we research, develop, manufacture and supply. This Supplier Code of Conduct sets out the minimum environmental, social and governance standards that we expect suppliers, their affiliates, workers, agents, subcontractors and other business partners involved in supplying Nichino to meet. Suppliers must apply equivalent standards within their own supply chains using a risk-based approach.

Suppliers must comply with all laws, regulations, permits, sanctions, contractual requirements and binding guidance applicable to their operations and supply to Nichino, including requirements relating to:

- Health, safety and welfare
- Human rights, modern slavery, forced labour and human trafficking
- Fair working conditions, wages, working time and freedom of association
- Child labour and the protection of young workers
- Equality, non-discrimination and prevention of harassment
- Bribery, corruption, fraud, facilitation of tax evasion and conflicts of interest
- Competition and antitrust law
- Trade controls, export controls, customs and financial sanctions
- Anti-money laundering and prevention of terrorist financing
- Environmental protection, pollution prevention, chemicals, waste, biodiversity, deforestation and climate impacts
- Product safety, quality, traceability and regulatory compliance
- Data protection, privacy, confidentiality, cybersecurity and responsible use of technology
- Whistleblowing and protection from retaliation

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

1. The United Nations Guiding Principles on Business and Human Rights and the International Bill of Human Rights
2. The International Labour Organization Declaration on Fundamental Principles and Rights at Work and applicable core labour standards
3. The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and relevant OECD due diligence guidance
4. The global chemical industry's Responsible Care® programme and applicable product stewardship principles

Application and enforcement

Compliance with this Supplier Code of Conduct is a condition of Nichino's contractual

relationships with suppliers. Suppliers must promptly notify Nichino of any actual or suspected material breach, regulatory investigation, sanction, exclusion or debarment relevant to their supply to Nichino and must take timely corrective and remedial action. Nichino may suspend or terminate the relationship for a serious breach, repeated breach, failure to remediate, or failure to cooperate, subject to applicable contract terms and law. Suppliers must maintain proportionate policies, risk assessments, due diligence records, training, controls and grievance mechanisms and, on request, provide evidence of compliance. Records must be accurate, complete and retained for the period required by applicable law or contract.
Nichino may conduct risk-based assessments and audits of relevant records, systems, processes and premises itself or through an independent third party, subject to reasonable notice, confidentiality, data protection and site safety requirements. Suppliers must cooperate, address findings within agreed timescales and ensure equivalent cooperation by relevant subcontractors.

Environment

Suppliers must identify, assess, prevent, mitigate and, where appropriate, remediate material environmental impacts arising from their operations, products and supply chains. They must maintain all required permits and controls, monitor performance and continually improve resource efficiency.
Suppliers must ensure that goods, materials and services supplied to Nichino are:

- sourced, manufactured, transported and disposed of in compliance with applicable environmental, chemicals, waste, packaging, biodiversity, deforestation and product stewardship requirements
- traceable to a level proportionate to legal and sustainability risk, with no deliberate use of illegally sourced raw materials
- produced using measures to prevent pollution, minimise greenhouse-gas emissions, energy and water use, waste and hazardous substances, and protect ecosystems and local communities
- supported by accurate environmental and sustainability information; suppliers must not make misleading claims or conceal material impacts

Social

Suppliers must respect internationally recognised human rights and undertake proportionate, risk-based human-rights due diligence covering their own operations and relevant business partners. They must provide or cooperate in effective remediation where they have caused or contributed to harm.
No goods or services supplied to Nichino may be produced:

- using forced, bonded, trafficked, prison or involuntary labour, or through recruitment practices involving worker-paid fees, coercion, withheld identity documents or restrictions on freedom of movement
- using child labour or young workers in work that is hazardous, unlawful or harmful to their education, health or development
- in breach of applicable requirements on wages, benefits, working hours, rest periods, safe and healthy conditions, freedom of association, collective bargaining, equality and non-discrimination
- without accessible, confidential grievance and whistleblowing channels and protection against retaliation

- without due regard to affected communities, land and resource rights, or Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, where relevant

Governance

Suppliers must comply with Nichino's applicable policies and standards on:

- Anti-bribery, corruption, fraud and prevention of facilitation of tax evasion
- Ethical business, conflicts of interest, gifts and hospitality
- Whistleblowing and non-retaliation
- Competition law, trade controls and sanctions
- Data protection, information security and confidentiality

Relevant policies are available on Nichino's website or on request and form part of this Code where incorporated into the applicable contract.

All suppliers must implement:

- effective governance, accountability and risk-management arrangements proportionate to their size, sector and risk profile
- risk-based due diligence on business partners, beneficial ownership, sanctions, human rights, environmental impacts and other relevant compliance risks
- accurate books and records, internal controls, training, monitoring and prompt investigation of concerns
- appropriate technical and organisational measures for UK GDPR, EU GDPR and other applicable data-protection and cybersecurity requirements, including timely incident and personal-data-breach notification
- business-continuity, product-quality, security and incident-response measures, including controls addressing cyber threats
- flow-down of relevant requirements to subcontractors and proportionate monitoring of their compliance