

SUPPLIER CODE OF CONDUCT OF KURARAY EUROPE GMBH („Kuraray“)

1. INTRODUCTION

Kuraray is committed to responsible and sustainable business practices and expects the same from all Suppliers and service providers (**“Supplier”**).

This Supplier Code of Conduct (**“Code of Conduct”**) sets binding ethical, social, and environmental standards throughout the supply chain. Supplier shall comply with these standards, pass them on to their own sub-suppliers, ensure their implementation and provide documentation upon request.

This Code of Conduct is based on internationally recognized frameworks such as the International Charter of Human Rights, the ILO Core Labor Standards, the UN Global Compact, and the OECD Guidelines for Multinational Enterprises. Adjustments will be made in the event of changes in legal requirements. Furthermore, reference is made to the Kuraray Code of Conduct, which is also of key importance: <https://www.kuraray.com/global-en/sustainability/conduct/>.

2. CONDUCT IN THE BUSINESS ENVIRONMENT

2.1 COMPLIANCE WITH LAWS

Supplier shall comply with all applicable laws, their internal corporate policies, as well as voluntary commitments. Where local laws are stricter, the higher standard applies. The standards set out in this Code of Conduct must be implemented in such a way that they do not conflict with local laws.

2.2 FAIR COMPETITION AND COMBATING CORRUPTION, MONEY LAUNDERING, AND CYBERCRIME

Supplier must adhere to fair competition and must not engage in anti-competitive practices.

Bribery or attempted bribery, inappropriate gifts, or undue advantages are strictly prohibited. With regard to other benefits, particularly invitations, restraint should generally be exercised. Benefits must always be reasonable and must never be intended to influence decisions of Kuraray employees.

Appropriate measures to prevent money laundering, terrorist financing, and cybercrime must be implemented. Any changes to payment details must be agreed with Kuraray in advance.

2.3 FOREIGN TRADE AND EXPORT CONTROL

Imports and exports must comply with all relevant foreign trade and customs regulations. Supplier shall not engage in the production or distribution of weapons.

2.4 CONFIDENTIALITY, INTELLECTUAL PROPERTY AND DATA PROTECTION

Supplier must protect personal data and confidential information, comply with applicable data protection laws, information security regulations and official requirements, and ensure that their employees are appropriately trained. Relevant declarations must be provided to Kuraray upon request.

Intellectual property rights as well as trade and business secrets of Kuraray and its affiliated companies must be fully protected. Confidential information may only be used for its intended purpose and must be safeguarded against unauthorized access through appropriate measures.

3. HUMAN RIGHTS AND FAIR WORKING CONDITIONS

3.1 PROHIBITION OF FORCED LABOR, HUMAN TRAFFICKING, AND CHILD LABOR

Supplier must refrain from and actively prevent any form of labor exploitation, including forced or compulsory labor, debt bondage, involuntary prison labor, human trafficking, or any other form of modern slavery. The confiscation of employees' identity documents, as well as any form of psychological or physical violence, is prohibited. Employment relationships must be voluntary and terminable with reasonable notice.

Child labor is strictly prohibited. Effective procedures for age verification must be implemented, and compliance with ILO Recommendations 146 and 190 regarding practical implementation must be ensured.

3.2 FAIR TREATMENT, PROTECTION AGAINST DISCRIMINATION, AND EQUAL OPPORTUNITIES

Employees shall be treated with dignity and respect. Supplier must ensure a work environment that is free from any physical, sexual, psychological, or verbal harassment or abuse.

Any form of discrimination or unjustified unequal treatment is prohibited unless it is based on employment requirements.

3.3 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The fundamental right of employees to form, join, or consider joining trade unions and employee representative bodies must be recognized.

The right of employees to form, join, or engage in trade unions or employee representative bodies and to participate in collective bargaining must be recognized and must not lead to discrimination. Employee representatives must not be disadvantaged and must have access to the workplace. Where such rights are legally restricted, the Supplier must provide reasonable alternatives for collaboration.

3.4 RIGHT TO FAIR COMPENSATION AND REGULAR WORKING HOURS

Supplier shall provide compensation and benefits that enable a living wage.

The principle of "equal pay for work of equal value" must be respected and implemented. Social benefits must comply with applicable national or local standards.

Employees must receive clear and regular written information on their compensation; unlawful wage deductions as disciplinary measures are prohibited. Working hours must not endanger health and must comply with legal maximum limits as well as ILO standards on working hours, breaks, and paid leave.

4. OCCUPATIONAL SAFETY, HEALTH, ENVIRONMENT, PRODUCT SAFETY, QUALITY, PACKAGING, RAW MATERIALS AND CYBER SECURITY

4.1 OCCUPATIONAL HEALTH AND SAFETY IN THE WORKPLACE

Supplier must ensure that employees are provided with a safe, healthy, and hygienic working environment and that appropriate measures for health protection are implemented. Within the framework of an effective management system, all necessary measures must be taken to prevent accidents and health impairments arising from work, related to work, or occur during work.

4.2 PRODUCT SAFETY

All applicable laws and legal requirements must be complied with. Relevant information (e.g., product information, safety data sheets, intended uses and registration obligations) must be provided to Kuraray upon request, and information supplied by Kuraray must be incorporated into the corresponding documents. All necessary product information must be communicated in a timely manner prior to delivery or performance of services. Any changes must be reported without delay.

4.3 QUALITY AND MANAGEMENT SYSTEMS

Supplier shall maintain quality management systems in accordance with ISO 9001 and ISO 14001. All necessary permits, licenses, and registrations must be obtained and continuously maintained. Operational obligations and reporting requirements must be properly fulfilled. Supplier must implement management systems designed to identify, prevent, and minimize risks related to human rights and environmental impacts.

4.4 PROCUREMENT OF RAW MATERIALS AND SERVICES

Supplier must implement processes for conflict minerals and other critical raw materials in accordance with the OECD Guidelines and ensure that further processing without verified due diligence procedures is excluded. The use of conflict minerals in products for Kuraray must be avoided. If the use of conflict minerals is unavoidable, Kuraray must be informed in advance in writing, and in full detail.

4.5 CLIMATE CHANGE, ENVIRONMENTAL PROTECTION, RESOURCE EFFICIENCY AND PACKAGING ACT

Products, packaging, transport, and disposal must be designed to ensure sustainability and efficient use of resources. Wastewater, emissions, and waste must be minimized, and hazardous substances must be handled safely. International environmental standards (e.g., EMAS, ISO 14001) as well as the EU Regulation 2023/1115 on deforestation, must be complied with.

Suppliers who place packaging on the market for the first time shall comply with the provisions of the Packaging Act (*VerpackG*) and register in the LUCID packaging register. Proof of registration and compliance with legal obligations must be provided to Kuraray upon request.

Kuraray reserves the right to verify the supplier's sustainability level through self-assessment (e.g., online questionnaires) or through on-site audits conducted by Kuraray or third parties.

4.6 CYBERSECURITY

Supplier that provide critical services or products within the meaning of the NIS 2 Directive or similar laws and regulations, or services that could compromise or contaminate our systems, shall implement appropriate IT and cybersecurity measures and comply with the legal requirements of the NIS 2 Directive, providing proof of compliance upon request.

5. IMPLEMENTATION OF THE CODE OF CONDUCT

Supplier may demonstrate the implementation of and compliance with the standards set forth herein through their own code of conduct, an industry standard, or an internal corporate policy.

In the absence of corresponding standards, Supplier shall comply with this Code of Conduct and ensure its communication to its employees.

To implement this, Supplier shall:

- Establish appropriate systems to ensure and monitor compliance, including within its supply chain. Implementation must be monitored in an appropriate manner. Corresponding documentation must be provided,
- in the event of non-compliance, promptly take appropriate corrective measures and inform Kuraray of relevant violations. This includes, in particular, incidents that have or could have a serious and irreversible impact on the quality of life of individuals who are potentially or actually affected,
- establish an anonymous complaint procedure,
- participate in training sessions upon request; and
- ensure that its own upstream Suppliers comply with the relevant standards.

Kuraray verifies implementation during the selection and evaluation of Supplier, for example through self-assessments, third-party evaluations, certificates or declarations, as well as on-site assessments and audits.

If Supplier fails to meet these requirements, the implementation of improvements is a prerequisite for initiating or continuing a business relationship. Deficiencies must be corrected or be subject to continuous improvement and documented as part of a systematic management process.