



Supplier Code of Conduct

Preface

Haldor Topsoe ("Topsoe", including its group companies) aims for high standards within sustainability and strives to create sustainable solutions that make a difference in the world of today - and tomorrow. We are committed to ensure that our solutions as well as our conduct are economically, environmentally and socially sustainable. This commitment encompasses our own operations, our solutions and products, and our Suppliers.

Hence this Supplier Code of Conduct (Code) outlines the minimum standards, which Topsoe requires its Suppliers to comply with when doing business with Topsoe in addition to observing all laws, regulation and international conventions governing their activities. And we expect our Suppliers to have appropriate business and quality management systems and procedures in place to enable adherence to this Code or its own equivalent code of conduct and to sustain acceptable business continuity. We expect our Suppliers to apply the same standards toward their suppliers and subcontractors that are involved in providing goods and services to Topsoe.

The framework for this Code takes its starting point in Topsoe's understanding of the 10 Principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the conventions of the International Labour Organization (ILO) in addition to the global chemical industry's Responsible Care® Program.

Ethics & business integrity

The Supplier shall conduct business in an ethical and fair manner and operate in compliance with applicable laws and regulations.

The Supplier is required to prohibit all types of bribery, corruption, fraud and money laundering.

The Supplier must refrain from offering and giving gifts and extravagant entertainment or hospitality towards any Topsoe employee or public officials with the aim to influence business decisions.

The Supplier is required to comply with applicable sanctions, export and import-laws and trade regulations.

The Supplier is required to conduct their business in compliance with applicable competition law and specifically avoid restricting fair competition through any kind of agreements, arrangements or mutual understanding with third parties .

The Supplier is expected to establish a grievance mechanism, e.g. a compliance hotline or whistleblower system, allowing for reporting anonymously any serious concerns or dilemmas related to this Code.

Topsoe expects its Suppliers to immediately identify and address situations where there is an actual conflict of interest, or even the appearance of conflict of interest.

Environment & climate

The Supplier is required to comply with all applicable laws, regulations and permits in relation to environmental matters. And the Supplier is expected to conduct its daily operations in an environmentally sound way by reducing waste, using fewer resources, consuming less energy and with a focus on protecting also the health of its neighbors and other stakeholders.

Materials supplied to Topsoe shall not contain any substances, which is prohibited by legislation or regulation applicable in the Supplier's countries of operations.

Health & safety

The Supplier is required to comply with applicable occupational health and safety laws and regulations. And the Supplier is expected to work systematically on providing its employees with a safe and healthy working environment aiming for eliminating risks and work-related accidents.

Human rights & labor standards

The Supplier is required to comply with all applicable laws and regulations applicable to working conditions and labor standards. The Supplier is required to respect human rights and not be complicit in violating human rights.

Any form of modern slavery is forbidden, including any kind of forced labor, bonded labor, prison labor or human trafficking.

The Supplier is required to comply with local law or collective bargaining agreements in relation to minimum wage, work-related matters such as pension, leave, overtime pay and working hours; the latter always to be voluntary and never excessive.

The Supplier is required to respect and uphold the employees' freedom of association involving trade unions or similar external

representative organizations. Their employees should have the right to collective bargaining in accordance with applicable laws and regulations, as well as the right for the employees to elect not to join a trade union or representative body.

It is required that all employees must be at least 15 years of age or minimum age for employment according to applicable local law. And no persons below the age of 18 years must perform any night or hazardous work. Irrespective of age and job responsibility, it is furthermore required that all employees are adequately trained for performing their job.

The Supplier is expected to embrace diversity and is required to ensure fair and equal treatment of all employees irrespective of race, sex, color, religion, sexual orientation, national origin, disability or age. All kinds of harassment and abuse whether physical, psychological, verbal or sexual is forbidden.

To the extent Topsoe purchases material from Supplier containing 3TG minerals (tungsten, tin, tantalum and gold), Topsoe requires that the Supplier informs Topsoe of the origin of such materials, and that the Supplier adheres to the standards of Responsible Minerals Initiative (formerly CFSI) and complies with applicable regulations.

Assurance

Topsoe reserves the right to ask the Supplier for supporting material to document compliance and monitor Suppliers compliance to this Code.

Topsoe reserves the right to discuss the future collaboration with the Supplier due to the seriousness of a non-compliance or repeated non-compliance with the Code.

Any breach or concern related to the Code should be reported immediately to Topsoe Compliance department: compliance@topsoe.com or via Topsoe Compliance Hotline: <http://www.topsoe.com/compliance-hotline>

About Haldor Topsoe

Haldor Topsoe is a world leader in high-performance catalysts and proprietary technologies for the chemical and refining industries. Based on cutting-edge research and development, we help our customers achieve optimal performance in all phases from design to daily operations – in the most responsible way. Topsoe is headquartered in Denmark and serves customers across the globe. www.topsoe.com