EXTRACT VERSION

Sumitomo Chemical Asia Pte Ltd

CODE OF ETHICS

1 November 2024

INTRODUCTION

A. President's Statement

Dear Colleagues,

We, Sumitomo Chemical Asia Pte Ltd ("**SCA**") deem it essential that, as a core member of the Sumitomo Chemical group, we implemented a "Code of Ethics" which all Board members, Officers and employees should follow in our daily business activities in line with the one Sumitomo Chemical Company Limited, Japan ("**SCC**") established and maintains.

Since the start of our operations in May 2006, SCA has been conducting business activities in accordance with local and international laws as well as our company's internal rules and regulations. So far, these have guided us well in the areas of corporate governance. However, in today's global business environment, just merely complying with laws is no longer sufficient. We need to establish and follow a code of ethics with a higher standard of ethics and integrity, as emphasized in our Corporate Core Values. Only by doing so, will we be able to earn the full trust and confidence of our stakeholders: customers, suppliers, investors and community, thereby ensuring SCA's continual growth and success.

What follows herein is the ***Code of Ethics*** which stipulates a set of well-defined corporate governance processes and behaviors required for all board members, officers and employees to enhance the trust and confidence of our stakeholders in us and accountability in our daily business activities. This Code of Ethics will not only promote legal and procedural compliance, but it is a guide on good virtues consistent with our Corporate Core Values. The Compliance Manual for Bribery Prevention, Due Diligence Manual and the Competition Law Compliance Manual complement this Code of Ethics.

I am confident that this Code of Ethics will help us act as responsible corporate citizens and will further reinforce the positive image of our company with our stakeholders and regulators. I request each member of SCA and its subsidiaries to read, understand and more importantly, to make a commitment to observe this Code of Ethics in the course of business.

Naoyuki Inoue
President
1 November 2024

B. Purpose

This "Code of Ethics" ("**Code**") has been prepared to acquaint you with the policies, rules and regulations ("**Policies**") of ***Sumitomo Chemical Asia Pte Ltd*** and its subsidiaries (namely, Sumitomo Chemical Philippines Inc. ("**SC Philippines**") and Sumitomo Chemical (Thailand) Co., Ltd ("**SC Thailand**"), (hereinafter collectively referred to as the "**Company**") that apply to all board members, officers and employees, including any of those temporarily employed, at the Company ("**Employee**" or "**Employees**" or "**you**"). Our other overseas offices will implement a similar Code of Ethics, with necessary variations in view of the laws and regulations that they are subject to and their local needs and practices and the respective office's policies. Please read this Code carefully and carry out our business activities in accordance with it.

The purpose of this Code is to aid you in conducting yourself in a legally and ethically appropriate manner and to define the scope of your responsibilities during the period of your employment with the Company. Our business at the Company is predicated on the good reputation of our employees for their integrity and high moral standards. It is the policy of the Company to prevent the occurrence of unethical or unlawful behaviour, to halt any unethical or unlawful behaviour that may occur as soon as reasonably possible after its discovery and to discipline those who violate the Policies contained in or referred to in this Code and the Company's related rules and regulations, including individuals responsible for the failure to exercise proper supervision and oversight to detect a violation by their subordinates.

You are responsible for reading and complying with the contents of this Code as well as all the laws and regulations in Singapore or those of other countries in which the Company conducts business in and the Company's regulations and rules applicable to you. Your performance appraisals will in part reflect your adherence to the Policies and the said laws and regulations, and the violation of the Polices, or violation of the said laws and regulations may result in disciplinary action up to and including immediate termination of employment. You must also realize that violation of such Policies, laws and regulations may result in sanctions on the Company and yourself as well as your imprisonment.

C. Changes in Policies and Rules

The Policies are subject to change, at any time, at the sole discretion of the Company, as are all other policies, rules, regulations, procedures, benefits and other programs.

Changes of the Policies will be effective on dates designated by the Company. The Policies supersede all pre-existing policies, rules, regulations procedures, benefits and other programs of the Company, to the extent that they conflict with the Policies. You may not rely on policies, rules, regulations, procedures, benefits and other programs that have been superseded. Changes to the Policies are to be approved by the Compliance Committee of the Company, and supervisors and managers do not have any authority to alter or waive the application of the Policies at their discretion.

1. EMPLOYMENT

A. Human Rights

The Company supports and respects international standards on human rights, such as the Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and promote respect for human rights in line with the United Nations Guiding Principles on Business and Human Rights.

B. Equal Employment Opportunity

The Company provides equal employment opportunities to all Employees and applicants for employment without regard to race, colour, religion, sex, national origin, age, military or veteran status, marital status and family responsibilities, disability or status in any group protected by laws and regulations, in accordance with applicable laws and regulations.

In addition, the Company complies with all applicable laws and regulations providing for non-discrimination in employment in every country where the Company's facilities are located, which applies to all terms and conditions of employment, including but not limited to, hiring, placement, promotion, termination, redundancy, layoff, recall, transfer, secondment, leave of absence, compensation and training.

C. Non-discrimination Against Individuals With Disabilities

The Company complies with all applicable laws and regulations, if any, providing for non-discrimination in employment against qualified individuals with disabilities. It is the Company's policy to, without limitation:

(a) Ensure that qualified individuals with disabilities are treated in a non-discriminatory manner in the pre-employment process and that Employees with disabilities are treated in a non-discriminatory manner in all terms, conditions, and privileges throughout the course of their employment.

(b) Keep all medical-related information confidential in accordance with the requirements of the applicable laws and regulations and retain such information in separate confidential files.

D. Policy Against Harassment

As part of the Company's policy on human rights, the Company is committed to providing a work environment free from all forms of discrimination and harassment, including sexual harassment and harassment based on any protected status. The Company is committed to the elimination of all harassment and discrimination in the workplace and will not tolerate such behaviour, whether by supervisors or by non-supervisory personnel and the Company complies with the Protection from Harassment Act, Chapter 256A of Singapore[2]. The Company aims to prevent the commission of any and all acts of workplace harassment and to provide procedures for resolution, settlement or prosecution of any act of workplace harassment by taking all steps required.

(a) With respect to sexual harassment, the Company prohibits the following:

(1) Unwelcome sexual advances; requests for sexual favors; and all other verbal or physical conduct of a sexual or otherwise offensive nature, especially where:

(i) submission to such conduct is made either explicitly or implicitly a term or condition of employment;

(ii) submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment;

(iii) such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment; or

(iv) sexual favors in return for employment rewards, or threats if sexual favors are not provided.

(2) Offensive comments, jokes, innuendoes, and other sexually oriented statements or conduct. Examples of the types of conduct expressly prohibited by the Policies can be found in Schedule 1, attached herewith.

(b) The Company prohibits workplace harassment in general, including the following:

(1) Language, behaviour or other forms of communication or conduct which is or is perceived to be threatening, abusive or insulting;

(2) Acts or omissions which amount to or are associated with stalking, including but not limited to, following someone, entering or loitering near someone’s place of residence or place of business etc.; and

(3) Acts or omissions which amount to or are associated with workplace bullying.

(c) The Company also prohibits any other conduct or behaviour deemed inappropriate by the Company.

[2] In the case of SC Philippines and SC Thailand, the relevant corresponding local legislation shall apply. For any clarification on such local legislation, please check with the RLCO.

E. Human Rights Policy Against Child Labour And Forced Labour

The Company is committed to upholding and supporting human rights at all levels including in its supply chain and expects its business partners and other relevant stakeholders to act in line with the Company's Human Rights Policy. As such, it is the policy of the Company to prohibit child labour and/or the use of forced or compulsory labour in the Company's workplaces and/or its supply chain.

The Company prohibits the employment of child labour (any persons below the age of eighteen years or such other minimum age as specified by the applicable local laws, whichever being the older age), at the Company's workplace or its supply chain, unless provided for under the applicable local laws. Employment contracts and all personnel records shall document all relevant details of the Employees, including, but not limited to, age and date of birth, and shall include employee's identification papers supporting such details. Such employee details must be verified by the HR of the Company against the original identification papers provided by such Employee.

The Company prohibits the employment of any person(s) or causing any Employee to work against his/her will, which includes, but is not limited to, slavery, chattel slavery, serfdom, bonded labour (including debt bondage), prison labour or forced overtime. The Company also prohibits any form of corporal punishment or coercion related to or in connection with the Employee's work.

The Company prohibits having a business relationship with any organization or person who abuses human rights in its workplace (including, but not limited to, employing child labour or forced labour). In the event any Employee becomes aware or has reason to believe that any organization or person with whom the Company has a business relationship abuses human rights in its workplace (including employing child labour or forced labour), this must be reported immediately to the Ethics Compliance Officer. The Company must cease its business relationship with such organization or person until the Company receives confirmation that such abuse of human rights has been eliminated.

This section of the Code is supplemented by the Manual for Due Diligence Process for Engagement of Customers & Business Partners dated 1 April 2023 and the Sumitomo Chemical Group Human Rights Policy.

6. ENVIRONMENT, HEALTH AND SAFETY

A. Environment, Health and Safety Policy

The Company is committed to environmental, health and safety protection for its Employees, customers, neighbours and others who may be affected by its products or activities. This policy also applies to every facility within the control of the Company. Our commitment not only complies with legal requirements, it is intended to surpass them.

The laws mentioned in this Chapter are only for illustration and do not constitute an exhaustive list of applicable environmental, health and safety laws. If you have any questions concerning the Policies stated in this Chapter, laws and regulations concerning environment, health and safety, you shall review and clarify them with the Ethics Compliance Officer and/or RLCO.

B. Environmental laws

National and local environmental laws regulate the emission of pollutants into the atmosphere, the discharge of pollutants into surface and underground waters and the handling and disposal of wastes.

Important laws in this area include the Workplace Safety and Health Act, Chapter 354A of Singapore and Environmental Protection and Management Act, Chapter 94A of Singapore[7]. The Company's policy is to ensure that the Company and Employees follow all applicable laws and regulations and comply with all aspects involved.

C. Safety and Health Laws

Other laws such as the Environmental Public Health Act, Chapter 95 of Singapore and the Factories Act, Chapter 104 of Singapore also safeguard health, safety and the environment, including physical safety and exposure to conditions in the workplace that could harm Employees. There are also regulations for transport, storage and supply of hazardous substances such as the Environmental Protection and Management (Hazardous Substances) Regulations 2008 enacted pursuant to the Environmental Protection and Management Act, Chapter 94A of Singapore. There are also standards for permissible exposure limits for certain substances such as methyl methacrylate in accordance with, but not limited to, the Factories (Permissible Exposure Levels of Toxic Substances) Order 1996[8].

D. Penalties

The laws and regulations in the area of environment, health and safety are complex, and violation can result in severe criminal penalties and civil liabilities for the Company and also for individuals. Criminal penalties including imprisonment can be imposed for knowingly, or in some cases even negligently, violating standards or making false statements.

If you learn from any source that any product or material manufactured, processed or distributed by the Company presents potential risk of injury to health or safety of the environment or if you are faced with an environmental, health or safety issue, you shall promptly contact the Ethics Compliance Officer or RLCO.

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[7] In the case of SC Philippines and SC Thailand, the relevant corresponding local legislation shall apply. For any clarification on such local legislation, please check with the RLCO.

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E. Guiding Principles

In fulfilling the Policies and complying with the laws and regulations applicable to this Chapter, the Company will be committed to the continuous improvement of its facilities towards the ultimate goal of zero accidents, illnesses, waste and environmental incidents. The Company will develop and implement environment, health and safety plans for facilities under its control using good management practices consistent with the following principles:

(a) provide all Employees with a safe and healthy workplace;

(b) operate facilities so as to prevent harm to public health and the environment, to conserve energy, water and raw materials, and to make a positive contribution to the surrounding community;

(c) ensure that products or materials can be produced, distributed, used and disposed of safely and advise customers on their safe use and handling;

(d) engage all key interested parties in a dialogue with respect to facility activities and appropriately respond to any concerns;

(e) promptly alert potentially affected persons to the known or reasonably foreseeable hazards of raw materials, products, by-products and activities, and inform them about proper protective measures;

(f) work with others to resolve problems created by handling or disposal of hazardous substances;

(g) contribute to the public's understanding and management of any significant risks arising from products or activities originating in Company facilities;

(h) train, equip and support all Employees in the management and implementation of environmental, health and safety activities; and

(i) contribute to the development of responsible and cost-effective governmental standards, laws and regulations concerning the environment, health and safety and cooperate in such matters with all levels of government.

F. Implementing the Policies

In order to effectively initiate, improve and sustain growing environment, health and safety performance expectations, a management system that defines requirements and strives for 100% conformance to those requirements will be implemented at each Company facility. This management system includes the elements of:

(a) Management commitment/leadership

The Company's concern and responsibility for environment, health and safety begins with the Company's Board of Directors. Each and every level of management must be actively involved and committed to the letter and spirit of this Code.

(b) Planning

The Company is responsible for planning and implementing its activities in a manner consistent with the Policies and its guiding principles.

(c) Objectives

Specific objectives and targets will be established and measured for key environment, health and safety areas, including pollution prevention, regulatory compliance, safety and health performance, and other activities addressed in Section E of this Chapter.

(d) Monitor and assess

The Company is responsible for monitoring and assessing its operations to ensure that Policies, objectives and targets are met. The Company's Board of Directors will utilize formal audits to periodically assess and verify compliance with requirements.

(e) External affairs and accountability

The Company accepts its responsibility to cooperate with all levels of government.

In this regard, the Company will make special efforts to be aware of legislative proposals and where necessary, to make known to legislators and other public officials the Company's position on relevant environmental, health and safety matters. Further, as a responsible corporate citizen, the Company will, where feasible, contribute to the development of effective regulations in the environmental, health and safety areas.

(f) Compliance

Each Employee is obligated to comply with the Policies stated in this Chapter. Employees who violate these Policies will be subject to disciplinary action up to and including immediate termination of employment.

7. IMPROPER PAYMENTS

The Company specifically prohibits authorizing, offering, giving, soliciting, or receiving any form of bribe or kickback, whether direct or indirect. These are criminal acts and can result in criminal prosecution of both the individual involved and the Company. Personal funds or resources may not be used to do that which is otherwise prohibited.

When dealing with any government officials, please refer to the Compliance Manual for

Bribery Prevention dated 1 April 2020, under Section II – Prohibition on Bribery of Government Officials. As a general rule, all gifts to public officials are forbidden. In those infrequent instances when it may be customary and lawful to give such a gift, its appropriateness must be discussed with your supervisor or the Ethics Compliance Officer and specific written clearance must be obtained. Any gift given under these circumstances must be of nominal value and must be given in an open and aboveboard manner.

With respect to government officials, it is not necessary that the item be given with the intent to influence that government official to constitute a violation of the applicable laws in Singapore. The law also prohibits the bribery of foreign government officials. Further information regarding these matters is set forth in the Chapter entitled "Anti-Bribery & Anti-Corruption" below.

8. POLITICAL CONTRIBUTIONS

It is the policy of the Company that all Employees comply with all campaign finance and ethics laws. The Company Policies prohibit the use of Company funds, assets, services or use of facilities, on behalf of a political party, candidate, or committee.

The Company is prohibited from compensating or reimbursing any Employees or individuals associated with the Company, in any form, for a donation within the meaning of the Political Donations Act, Chapter 236 of Singapore[9].

The Company's policy is not intended to discourage or prohibit any Employee or individual associated with the Company from voluntarily making personal political contributions; from participating in the political process on their own time and at their own expense; from expressing their own personal views on legislative or political matters; or from otherwise engaging in political activities, subject always to the Policies.

9. ACCURATE DATA & RECORD KEEPING

Company business records and data must always be prepared accurately and reliably and stored properly. The law also requires the Company to keep books, records and accounts which accurately and fairly reflect all transactions and disposition of assets of the Company, and for prescribed retention periods depending on the nature of these documents. All transactions must be executed only in accordance with management's general or specific authorisation. The Company's books, records, and accounts must reflect, accurately and fairly and within the Company's normal system of accountability, all transactions of the Company and all other events that are the subject of specific regulatory record keeping requirements.

All transactions must be recorded as necessary or appropriate to permit the preparation of financial statements in conformity with generally accepted accounting principles and other applicable rules, regulations, and criteria and to ensure full accountability for all assets and

[9] In the case of SC Philippines and SC Thailand, the relevant corresponding local legislation shall apply. For any clarification on such local legislation, please check with the RLCO.

activities of the Company. All of the Company's assets and liabilities must be recorded in the regular books of the Company. Under no circumstances may there be any unrecorded fund or asset of the Company regardless of the purpose for which the fund or asset may have been intended, or any improper or inaccurate entry knowingly made on the books and records of the Company.

No payment on behalf of the Company may be approved or made with the intention, understanding or awareness that any part of the payment is to be used for any purpose other than that described by the documents supporting the payments. All receipts and disbursements must be fully and accurately described in the books of the Company and must be supported by appropriate documentation properly describing the purposes thereof.

The Company strictly prohibits any kind of falsification of data, books, records, accounts, declarations, information etc. and/or making or providing any false statements, declarations or information.

If you have reason to believe that the Company's books and records are not in accord with the foregoing requirements or that there has been any falsification of data, immediately report the matter to your supervisor or the Ethics Compliance Officer or the Speak Up Hotline.

10. ANTI-BRIBERY & ANTI-CORRUPTION

The Company complies with all laws and regulations concerning prohibiting the actual or attempted bribery to individuals and entities, and corrupt practices.

Under the laws in most of the countries where the Company conducts its business, including but not limited to, Singapore, the People's Republic of China, Thailand, Malaysia, Philippines, Vietnam, India, Indonesia and Australia, it is illegal for an individual to give, or to receive any benefit in cash or in kind as an inducement to or reward for any person doing or refraining from doing anything (or for showing favour or disfavour to any person). The prohibition under the laws applies to both government officials and non- government persons.

The Company strictly prohibits providing directly or indirectly, or offering or promising to provide payment of Anything of Value (as defined in the Compliance Manual for Bribery Prevention) or authorizing or permitting others to do so, to a government official or to any other person or entity with whom the Company has a current or potential business relationship if it might appear to such persons given, offered or promised payment or Anything of Value that you are seeking to induce them to make any act or decision or to influence the decision-making process, for the purpose of acquiring or retaining business or any other commercial advantage.

This section of the Code is supplemented by the Compliance Manual for Bribery Prevention dated 1 April 2020 and Manual for Due Diligence Process for Engagement of Customers and Business Partners dated 1 April 2023.

Employees who violate these policies are subject to disciplinary action up to and including immediate termination of employment.

11. LEGAL CONTROLS ON INTERNATIONAL COMMERCE

A. General

The Company's policy is to strictly comply with all applicable laws, rules and regulations related to this area.

B. Import and Export Controls

The Company will conduct its worldwide operations in compliance with all economic sanctions laws and regulations which apply to its business or transactions, in particular the laws of Singapore, the United States, the European Union, the United Kingdom, United Nations, Japan and the Arab League when deciding whether to proceed with any particular business and transaction involving the import and/or export of certain technologies, technical data, chemical products and other related products into and out of the Company's region, even if these laws may not otherwise apply to the business or transaction in question, and other legal restrictions against the movement of Strategic Goods (as defined and updated by relevant laws and government bodies) which can be used for the manufacture, repair or development of military equipment or weapons of mass destruction by identified entities and sovereign powers categorized as Concerned Entities (as defined and updated by relevant laws and government bodies) or Concerned Countries (as defined and updated by relevant laws and government bodies).

Non-compliance with the relevant economic sanctions laws, import and export controls can subject the Company to criminal and civil penalties, the seizure/detention of products or assets, and the denial of import or export privileges.

The Company strictly prohibits, directly or indirectly:

(a) the selling of, domestically or in export, any chemicals or other products or data in a manner that supports any possible chemical-weapons use or development of weapons of mass destruction;

(b) the engagement in or support of any activities, projects, transactions, or other dealings in violation of any applicable or relevant economic sanctions; or

(c) the approval, financing, assisting with, support of, or otherwise facilitating any activities, projects, transactions, or other dealings by third parties in violation of applicable or relevant economic sanctions regulations.

This section of the Code is supplemented by the Manual for Due Diligence Process for Engagement of Customers & Business Partners dated 1 April 2023.

C. Countervailing and Anti-dumping Duties

The import of goods into many other countries, including India, the People's Republic of China and the United States, may be subject to countervailing duties where it is determined that a countervailable subsidy is being provided with respect to the subject goods and injury is found to exist in the country of import. Similarly, import of goods may also be subject to the imposition of anti-dumping duties where the export price of the subject goods is less than the normal value, and injury is found to exist in the country of import.

It is the policy of the Company to minimize any risks of the imposition of countervailing or anti-dumping duties.

D. Customs

It is the policy of the Company to comply with all laws and regulations relating to customs and the import of goods into any country and to declare the correct value of the imported goods and to pay the duties or taxes charged by the government in the country of import.

12. ANTITRUST

The Company complies with all laws and regulations concerning anti-trust and anti-competition behaviour.

Under the laws in most of the countries where the Company conducts its business, including but not limited to, Singapore, the People's Republic of China, Thailand, Malaysia, Philippines, Vietnam, India, Indonesia and Australia, it is against the law to participate in anti-trust and anti-competitive behavior.

A. Guidelines

No Employee is permitted to engage in anti-competitive agreements or conduct. Employees shall not initiate, discuss or be a party to any agreements (such as price fixing, bid rigging, allocation of markets or customers, or similar illegal anti-competitive activities) which have as their object or effect the prevention, restriction or distortion of competition, and shall not through any act or omission procure or facilitate the abuse by the Company of any dominant position it may occupy in any market.

Ignoring competition and anti-trust laws where applicable can have serious consequences. The latest version of the Company's Competition Law Compliance Manual is intended to provide guidance to enable the Employee not to engage in anti-trust and anti-competitive practices. The Competition Law Compliance Manual is intended to supplement the Competition Act, Chapter 50B of Singapore[10] and the various guidelines, practice statements and guidance notes which may be published by the Competition and Consumer Commission of Singapore or such other governing authorities from time to time.

[10] In the case of SC Philippines and SC Thailand, the relevant corresponding local legislation shall apply. For any clarification on such local legislation, please check with the RLCO.

In addition to the Company's Competition Law Compliance Manual, a summary of the DO'S and DON'TS below is intended to provide guidance to enable the Employee not to engage in anti-trust and anti-competitive practices. The list below is non-exhaustive and, accordingly, not every possible circumstance is discussed in this list. Therefore, if you have any questions concerning the contents of this Chapter or the Company's Competition Law Compliance Manual, please review and clarify them with the RLCO.

B. Dealings With Competitors

(a) DON'T discuss, share or agree with a competitor sales-related information such as:

- (1) price information, pricing methods, price changes or business information which might affect prices such as marketing programs, costs, discounts, rebates, terms of sale or profit margins;
- (2) future pricing, marketing or sales plans;
- (3) "uniform" terms of sale, delivery, warranties or contract provisions;
- (4) the sharing of markets or allocation of customers or territories;
- (5) details in the tendering of bids, or agreeing either to bid or not bid on any business deal; or
- (6) information about our customers.

(b) DON'T discuss, share or agree with a competitor production-related information such as:

- (1) levels of production, production processes and methods;
- (2) stocks and stock policy; or
- (3) production costs, including raw materials.

(c) DON'T discuss, share or agree with a competitor planning-related information such as:

- (1) proposed research and development;
- (2) proposed capital investment;
- (3) proposed market entry, e.g. with a new product or entry into a new market area; or
- (4) a proposed increase or decrease in production capacity.

(d) DON'T discuss or act jointly with one or more competitors through an agreement or collective boycott to put another competitor, distributor or customer at a disadvantage.

(e) DON'T make any statements regarding prices or matters affecting prices at trade association or other meetings with competitors, whether formal or informal, and do not participate in discussions or improper conversations on competition-related matters even where others do.

(f) DON'T remain silent after receiving information from a competitor about an increase in the price of competing products or any of the foregoing topics.

(g) DO leave any conversation, meeting, or informal gathering where any of the foregoing topics are being discussed immediately so that you are no longer involved. Voice out your objection and ensure that your objection is noted down in the meeting minutes, if any. Always prepare a Competitor Meeting Report (refer to the Company's Competition Law Compliance Manual for details) and immediately provide it to your supervisor and RLCO.

(h) DO notify your supervisor and the RLCO immediately of any communication involving the above topics.

(i) DO be conservative and keep the competition rules in mind when you have any contact with a competitor, even on an informal and purely social level. If you feel an activity might breach competition law or rules in any way, do not do it.

(j) DO learn through the marketplace, and not directly from competitors.

(k) DO act with caution when meeting with any group of competitors (including trade associations, consortiums, standard setting groups, joint ventures, or buying cooperatives).

(l) DO limit any communication with a competitor who is both your customer and supplier to only the data which you normally communicate with other customers and/or suppliers.

C. Dealings if the Company is in a dominant or potentially dominant position

(a) DON'T:

(1) attempt to require any customers, distributors or dealers to purchase one product as a condition to your selling another product to them;

(2) sell products at a loss;

(3) extend different discounts, rebates, other price adjustments, or different terms or conditions of sale to similar customers, distributors or dealers for the same service and products;

(4) grant discounts in a selective way to customers of your competitors; or

(5) threaten or discuss termination of dealing with a customer, distributor or dealer, or refuse to deal with new a customer, distributor or dealer without a legitimate justification.

(b) DO get your supervisor’s approval before:

(1) entering into any agreement with any distributor or dealer restricting their customers or the areas in which the distributor/dealer will sell the Company’s products;

(2) terminating dealings with a customer, distributor or dealer, or refusing to deal with a new customer, distributor or dealer;

(3) introducing new, or changes to existing discount schemes, and when drafting the rules which go with them;

(4) offering customer prices, terms of sale, special marketing programs or promotional assistance which are not made available to all competitors of that customer;

(5) entering into any agreement, understanding or discussion with any customer, distributor or dealer that would require them to use our goods or services exclusively;

(6) entering into any agreement, understanding or discussion with any distributor or dealer concerning resale prices, other terms and conditions of resale; or

(7) where proposing to use the “meeting the competition” defence, as this will have to be assessed to ensure all customers are to be treated equally and will not result in predatory pricing.

SCHEDULE 1

Examples of the types of conduct expressly prohibited by the Policies include, but are not limited to, the following:

- unwelcome touching, such as rubbing or massaging someone's neck or shoulders, stroking someone's hair, or brushing against another's body;
- sexually suggestive touching;
- grabbing, groping, kissing, fondling, violating someone’s “personal space”;
- lewd, off-color, sexually oriented comments or jokes;
- foul or obscene language;
- leering, staring, stalking;
- sexually explicit or suggestive messages, posters, calendars, photographs, graffiti, cartoons;
- unwanted or offensive letters or poems;
- offensive e-mail, voice-mail or text messages;
- Sexually oriented or explicit remarks, including written or oral references to sexual conduct, gossip regarding one’s sex life, sexual activities, deficiencies, or prowess;
- Questions about one’s sex life or experiences
- Repeated requests for dates
- Sexual assault or rape
- Any other conduct or behaviour deemed inappropriate by the Company

Harassers and harassed persons can be of any sex, the harassment can occur among individuals of the same sex or different sex, and harassment can occur among peers and coworkers.

ANNEX B
MODES OF SPEAK-UP REPORTING

If you suspect with good reasons that a crime or violation of the Company's policies have been committed or you have been the subject of harassment or unlawful discrimination, please make the Speak Up Report by the following methods:

For SCA:

External Hotline	By Email	sca.speakup@agasia.law (Attention to: Mr Daren Shiau)
	By Telephone	+65 6890 7188 (Attention to: Mr Daren Shiau)
Internal Hotline	In Person	1. Ethics Compliance Officer; or 2. RLCO Address: 3 Fraser Street, #07-28 DUO Tower, Singapore 189352
	By Telephone	+65 6385 6867 (Attention to: RLCO)
	By SPEEKI	URL: https://portal.speeki.com/?companySlug=sumitomochemicalasiapteltd QR Code:

For Sumitomo Chemical Philippines Inc. and **Sumitomo Chemical (Thailand) Co., Ltd**:

1. By Email

    - Email Address:
      external-speakup@sumitomo-chem.com.sg
      (Attention to: RLCO)

2. By Telephone

    - Telephone number: +65 6385 6867
      (Attention to: RLCO)

To assist you in drafting a Speak Up Report, please refer to the following Speak Up Report format:

WHAT GOES INTO A SPEAK-UP REPORT?	
Nature and Details of the alleged incident:	[*Bribery / Conflict of Interest / Fraud / Competition / Money Laundering / Sanctions / Human Rights / Environment, Health and Safety, Other*]
Drafting notes: **Keep your report as factual as possible and refrain from providing your personal opinions or views.**	
Identify the person(s) engaged in the alleged incident:	[*Include Full Name(s) and Designation(s) of individuals involved*]
Example: Mr. John Doe, Director of Legal Affairs **Mr. Unknown, Site Supervisor**	
Where did the alleged incident or violation occur?	[*office premises / business trip / customer's or business partner's location, transactional documentation, etc.*]
Drafting notes: **We recognise that the alleged incident may not have occurred in a particular location or may have occurred on multiple occasion(s) at different location(s). If this incident was observed in some documentation or during a business transaction, please indicate this accordingly.**	
Please provide the specific or approximate time(s) the alleged incident occurred:	
Drafting notes: **If the alleged incident occurred on multiple occasions, then please set out the number of times it occurred, together with approximate date(s) and time(s).**	
How long has this problem been going on?	
How did you become aware of the alleged incident?	[*I observed it / it happened to me / I heard it / a co-worker or external party told me / I overheard it / I accidentally found a document or file etc.*]
Please identify any person(s) who have attempted to conceal the problem and how they tried to conceal it?	[*Identify by name(s) and designation(s)*]
Examples: **Ignored it / changed documents / said it was not a problem / said they would look into it but did not take any action.**	
Provide all relevant details regarding the alleged incident, including the location(s) and contact details of other witnesses (if any) and any other information that could be useful in the investigation and ultimate resolution of this situation	[*Include details such as date, time, any witness(es) present, supporting documentation*]
Sign off your report with your contact details. If you choose to remain anonymous, please ensure that there is a way for us to contact you to obtain further information / clarification if need.	[*If you choose to remain anonymous, please set up a separate email account. However, please note that when you identify yourself in the email, the complaint carries more weight*]

NOTE: The report may be made anonymously. However, please provide a means for us to contact you while remaining anonymous (for example, set up a private and anonymous email account), as we may need to contact you for further details, in order to conduct a full and proper investigation.

PROTECTION: ANY CONCERNS WILL BE DEALT WITH APPROPRIATELY. AND **CONFIDENTIALLY**. WE ASSURE YOU THAT YOU WILL NOT FACE ANY RETALIATION FOR A SPEAK UP MADE IN GOOD FAITH.