

SUPPLIER CODE OF CONDUCT



TOPSOE
Making Energy Transition

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At Topsoe, including its group companies, we are committed to act responsibly by making meaningful contributions toward solving global challenges, while balancing the economic, social, environmental and ethical aspects of our value chain. This commitment encompasses how we engage with suppliers and the influence this will have on our operations and products.

We expect our suppliers to commit to our standard of responsible business conduct – a standard of conduct that our suppliers can also expect from us.

This Supplier Code of Conduct (Supplier Code) outlines the minimum standards, which Topsoe requires its suppliers to comply with when doing business with Topsoe in addition to observing relevant laws, regulations and international conventions governing their activities. Where the standards in this Supplier Code differ from local and national laws as well as international standards, we expect our suppliers to apply the stricter standard.

The framework for this Supplier Code takes its starting point in Topsoe's commitment to the Ten Principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the conventions of the International Labor Organization (ILO) in addition to the global chemical industry's Responsible Care® Program and ISO standards for environmental management and occupational health and safety.

We expect our suppliers to apply the same standards outlined in this Supplier Code toward their suppliers and subcontractors that are involved in providing goods and services to Topsoe.

IMPLEMENTATION

Our suppliers are required to acknowledge, commit and adhere to the principles of this Supplier Code. Topsoe reserves the right to require that the supplier provide supporting material to monitor and document suppliers' compliance to this Supplier Code.

We expect our suppliers to have appropriate procedures and quality management systems in place to enable adherence to this Supplier Code. These may be reflected in their own equivalent code of conduct, which will sustain acceptable business continuity.

The objective of this Supplier Code is to create the best foundation for building strong business ties and long-standing relationships with our suppliers. In the incident of serious non-compliance or repeated non-compliance with the Supplier Code, Topsoe reserves the right to require corrective action. If non-compliance continues, Topsoe will evaluate future collaboration with the supplier.

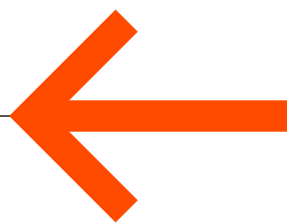
REPORTING CONCERNS

Any potential breach or concern related to the Supplier Code should be reported immediately to Topsoe, either to the relevant Topsoe representative or, if desired, via the Topsoe Compliance Hotline. The Topsoe Compliance Hotline is a secure online portal, administered by a third-party provider, meaning it is possible to remain completely anonymous if you choose. Topsoe ensures that incoming concerns are handled promptly, professionally, and with complete confidentiality.

The supplier is also expected to establish and maintain an appropriate reporting mechanism, which allows for anonymous reporting by its employees and

other interested parties, without fear of retaliation, of any serious concerns or issues related to compliance with this Supplier Code.

Report a concern via the Topsoe Compliance Hotline: [Topsoe Compliance Hotline | Topsoe](#)



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, and establish and maintain processes designed to prevent such activities;
- refrain from directly or indirectly promising, offering or giving gifts, entertainment, hospitality or any other thing of value to any Topsoe employee, public official, or any other individual with the aim to improperly influence business decisions or otherwise gain an undue advantage for Topsoe or the supplier itself;
- comply with applicable financial and trade sanctions, export and import-laws and trade and chemical regulations;
- conduct its 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

- ensure that internal processes are adapted to comply with all data ethics, personal data protection and privacy regulations that apply to its business; and
- immediately identify and address situations where there is a potential or actual conflict of interest, or even the appearance of conflict of interest, in relation to its business for Topsoe.

ENVIRONMENT & CLIMATE

The supplier is required to comply with applicable environmental and chemicals laws, regulations and permits in relation to environmental matters.

The supplier is required to

- ensure that materials supplied to Topsoe do not contain any substances that are prohibited by legislation or regulation applicable in the supplier's countries of operations (covering both the country of manufacture and country of delivery);

The supplier is expected to meet or be actively working towards:

- conducting its daily operations in an environmentally sound way by using fewer resources and energy, and minimizing waste and pollution
- accounting, monitoring and disclosing all greenhouse gas (GHG) emissions based on the Greenhouse Gas Protocol's standards and guidance
- committing to a science-based decarbonization target in line with the Paris Agreement and ideally achieve validation from the Science Based Targets initiative (SBTi)
- developing a plan to reach targets and implementing necessary actions including sourcing renewable energy
- reducing the carbon footprint of products and services delivered to Topsoe
- engaging in a dialogue to provide product level data to support Topsoe's Scope 3 reporting and life cycle assessments (LCA)
- reporting general ESG performance through Ecovadis and CDP
- striving to implement circular economy principles across the business, where feasible
- requiring similar standards of own suppliers.

HEALTH & SAFETY

The supplier is required to comply with applicable chemical, and occupational health and safety laws, regulations and permits as a minimum. The supplier is further expected to

The supplier is required to

- work systematically on providing its employees with a safe and healthy working environment striving for eliminating risks and work-related accidents;
- require similar standards of its own suppliers and ensure contractor safety;
- conduct its daily operations with a focus on protecting the health and safety of its neighbors and other stakeholders;
- comply with Topsoe safety guidelines while working on behalf of Topsoe at third party sites or at Topsoe sites; and
- record attendance and any health and safety issues while working for Topsoe.

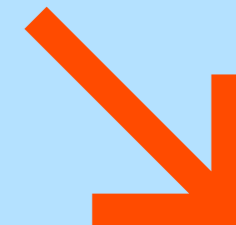


HUMAN RIGHTS & LABOR STANDARDS

The supplier is required to comply with all applicable laws, regulations and permits related 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 child labor, forced labor, bonded labor, prison labor or human trafficking;
- comply with local law and 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;
- respect and uphold employees' freedom of association involving trade unions or similar external representative organizations, and grant employees the right to collective bargaining in accordance with applicable laws and regulations, as well as the right to elect not to join a trade union or representative body;
- provide employees with clear, written employment contracts in a language they understand, outlining their rights, responsibilities, and terms of employment, including wages, working hours, and benefits.
- ensure that all employees are at least 15 years of age or minimum age for employment according to applicable local law, and that no persons below the age of 18 years perform any night or hazardous work; and
- provide all employees - irrespective of age and job responsibility - with adequate training for performing their job.



The supplier is expected to

- embrace diversity and ensure fair and equal treatment of all employees irrespective of race, sex, color, religion, sexual orientation, national origin, disability or age; and
- establish accessible and confidential grievance mechanisms that allow employees to raise concerns about workplace conditions, human rights, or labor standards without fear of retaliation
- forbid all kinds of harassment and abuse whether physical, psychological, verbal or sexual; and

To the extent Topsoe purchases material from suppliers containing 3TG minerals (tungsten, tin, tantalum and gold) or cobalt-based minerals/metals, Topsoe requires that the supplier inform us regarding the origin of these and declare that they comply

with applicable regulations and adhere to business standards for smelters and importers, specifically the [Responsible Minerals Initiative](#).



ABOUT TOPSOE

Topsoe is a leading global provider of advanced technology and solutions for the energy transition.

Built on decades of scientific research and innovation, we are working with customers and partners to drive energy resiliency and to achieve their sustainability goals.

We offer world-leading solutions for transforming renewable resources into fuels and chemicals, and we provide technologies needed to produce low-carbon and conventional fuels and chemicals as well as ensuring clean air.

We were founded in 1940 and are headquartered in Denmark, with over 2,800 employees serving customers all around the globe.

To learn more, visit www.topsoe.com.

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