

UNION PETROCHEMICAL GROUP

Code of Conduct Policy

Updated September, 2024

1. Code of Conduct Policy

Union Petrochemical Group ("Group") upholds core values of integrity, partnership, leadership, commitment, and innovation. These principles guide our socially responsible practices and commitment to the highest ethical standards.

This Code of Conduct defines the expected standards for our employees and provides guidance to our Business Partners, encouraging them to acknowledge and adhere to these principles. By following these guidelines, we foster trust, transparency, and cooperation in all business relationships.

2. Code of Conduct:

1. Professionalism and Integrity

Business dealings should be conducted with professionalism, honesty, and the highest standards of integrity.

2. Confidentiality

Information categorized as confidential or not publicly available should be safeguarded. Employees and Business Partners must not disclose any sensitive information regarding products, customers, or internal matters without Group authorization.

3. Conflict of Interest

All transactions with the Group must be fair and transparent. The Group does not condone actions that result in a conflict of interest, such as obtaining unfair advantages through gifts, entertainment, or fees to Group employees. However, nominal gifts or customary forms of entertainment in the normal course of business are permitted.

4. Anti-Bribery and Corruption

Bribery and corruption are strictly prohibited. All parties must comply with anti-bribery laws and standards.

5. Antitrust Compliance

Business Partners must observe antitrust laws. Unfair practices, such as sharing confidential information with competitors, are prohibited. Business Partners should communicate responsibly within the industry to avoid violations of these laws.

6. Prohibited Use of Controlled Substances

The Group prohibits the possession, use, or distribution of controlled substances, including illegal drugs and other unlawful materials.

7. Respect for Human Rights

All employees and Business Partners must respect and uphold international human rights laws, specifically those outlined in the United Nations Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

8. Harassment-Free Workplace

Business interactions should be respectful and free from any form of personal or sexual harassment. The Group is committed to fostering a safe and respectful work environment.

3. Reporting and Non-Retaliation

We encourage employees and Business Partners to report any suspected violations of this Policy. Retaliation against those who, in good faith, report a potential violation is strictly prohibited.

4. Consequences of Code Violations

Violations of this Code may result in disciplinary actions, including the termination of business relationships for partners, dismissal of employment, or criminal prosecution.

5. Review

The Group will periodically review this Policy to ensure it remains current, relevant, and effective.