



## Code of conduct - the basis for our success

*As a global company, Masan High Tech materials (MHT) bears a high level of responsibility to all its stakeholders including customers, employees, investors and the communities in which it conducts business.*

*Our Code of Conduct is guided by the internationally recognized principles for the protection of human and labor rights as expressed in the United Nations Universal Declaration of Human Rights, the ILO Core Labor Standards, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Our company respects applicable law, whether local, regional or national, everywhere in the world, and expects its employees and business partners to understand and accept the Code.*

*The employee agrees to take all reasonable and necessary steps to comply with the Code, the law, as well as Company policies and procedures. Employees should exercise good judgment and avoid even the appearance of improper conduct.*

*This document briefly summarises the key principles. For detailed information, please refer to the “Explanations on the Code of Conduct”. If you are in doubt as to whether a course of action is appropriate, get advice from your Line Manager / Supervisor, the Human Resources Manager or one of the Executive Management Team.*

**Craig Bradshaw**

**Chief Executive Officer -  
MHT**

**Dr. Hady Seyeda**

**Deputy Chief Executive  
Officer – MHT**

**Chief Executive Officer  
HCS**

**Stephan Broske**

**Chief Financial Officer  
HCS**

## **1 – Fair Competition**

MHT is committed without reservation to fair competition and to fair contracting practices with its business partners. Any forms of collusion, or coordination that result in the unfair advantage for one party are prohibited among competitors, as is the abuse of a dominant market position.

## **2 – Business and financial records**

Documents, including those in electronic form, are the property of MHT and are kept secure. Personal data is treated with the utmost care and in strict confidence. MHT's financial reports are prepared in accordance with the relevant legal requirements and internationally accepted accounting practices and principles. All necessary measures to prevent money laundering are taken within MHT's sphere of influence.

## **3 - Compliance with International Commercial Law and Provisions on Exports**

MHT complies with all international agreements, conventions and treaties, as well as national laws controlling trade and financial transactions, and consistently monitors compliance with international and national export control laws.

## **4 - Company assets**

All employees are similarly responsible for the protection of MHT's material and immaterial assets. Particular importance is attached to the results of scientific research and technical developments, such as inventions, patents and other know-how. It is prohibited to disclose company and business secrets to third parties in any form. Third party confidential information that is within MHT's responsibility must also be protected with the same care.

## **5 - Conflicts of interest**

MHT has a zero tolerance policy for bribery and corruption. MHT does not enter into business relationships whose existence or desired scope is dependent on the payment of bribes. At MHT, preventing corruption also means obtaining information about business partners in advance. Business decisions on behalf of MHT may not be influenced by the acceptance of advantages or the granting of benefits and privileges ("perks").

## **6 - Behaviour toward Government Agencies; Cooperation**

The Company is committed to complying with all laws and legislation regulating its businesses. Therefore MHT is dealing with all relevant government agencies cooperatively and with an open approach. If an employee learns that a government agency, legislative body, or other authorized institution, is conducting an investigation of MHT, the legal department must be informed immediately.

## **7 - Environmental Protection and Safety**

MHT and its employees bear responsibility for protecting people and the environment in accordance with all legal and regulatory requirements in the relevant jurisdiction, as well as international industry practice. The Health & Safety, Environment, and Quality policies are the primary guide for all employees on these matters. Safety is the top priority in all dealings involving products that pollute the environment. Additionally each and every employee shares in the responsibility for ensuring the occupational safety in his or her area.

## **8 – Labour and employment**

MHT does not tolerate discrimination or harassment, abuse or corporal punishment in any form, whether by business partners, candidates or applicants, or employees. Furthermore, MHT has a zero-tolerance policy towards any form of forced labour, modern slavery or the most severe form of child labour.

## **9 – Behaviour towards Suppliers of Raw Materials**

MHT is working together with partners whose stance on ethical, social and environmental policy matters is consistent with that of MHT. For this reason, all suppliers of raw materials have to prove that all applicable guidelines laws and regulations, like the OECD Due Diligence and EU regulation for conflict raw materials are complied with and that they are in possession of all of the necessary permits, authorizations and approvals. Furthermore, all parties involved in our supply chain commit to comply with our purchasing guidelines.

## **10 – Ensuring Compliance**

MHT does not tolerate any legal violations whatsoever and consistently complies with the guidelines and rules described. Therefore compliance with this Code of Conduct, the law and Company's policies is subject to regular reviews, executed on behalf of the executive management by the supervisors.

## **11 – External Relations**

MHT has a policy on how to deal with external stakeholders and who is authorised to communicate with them. Therefore, in all matters concerning the company, employees who do not have authorization must avoid giving the impression that they speak on behalf of the company.

## **12 – The Compliance Organisation and Contact Persons**

Your Line Manager / Supervisor is the first point of contact for any questions you may have regarding the Code of Conduct.

If the matter concerns your supervisor him or herself, you can contact the HR department or your next higher supervisor.

The Executive Management Team performs the corporate compliance function in the MHT Group. A member of the Team is your contact person for any questions you may have regarding the Code of Conduct. Inquiries can also be made anonymously, and all reasonable efforts are made to maintain confidentiality, although MHT is, of course, obligated to initiate investigations and to comply with the law and support law enforcement.

If you have specific legal questions, particularly regarding whether certain actions are lawful, please contact the appropriate Legal Department.

MHT guarantees that no employee will be subject to discrimination, retaliation or any other adverse treatment based on the employee having made a report in good faith.