Code of Conduct for Bluestar Silicones' Business Partners

Bluestar Silicones' Business Partners Code of Conduct is aligned with the UN Guiding Principles on Business and Human Rights and internationally recognized standards, including the ILO Declaration on Fundamental Principles and Rights at Work.
It sets Bluestar Silicones' fundamental requirements and expectations of its Business Partners with respect to lawful and compliant operations, business ethics, human rights protection, labor practices, and environmental protection. This Code applies to all Bluestar Silicones' Business Partners, including but not limited to suppliers, distributors, agents, traders, resellers, service providers, and joint venture partners.
Business partners may be required to complete self-assessments and, within a reasonable scope, to cooperate with compliance audits, on-site inspections, and related training activities conducted by Bluestar Silicones or its authorized third parties. By entering into an agreement with Bluestar Silicones, Business Partner confirms to be bound by the following principles and requirements and will:

Lawful and Compliant Business Practices

- Comply with all applicable laws and regulations;
- Not engage in dealings, directly or indirectly, that involve a breach of sanction regulations, including those issued by China, the EU and the US;
- Operate in accordance with applicable antitrust laws, including rules pertaining to price fixing and market sharing with competitors;
- Forbid and refuse to support money laundering in any form.

Business Integrity and Anti-Corruption

- Not offer, give, request, or accept bribes, kickbacks, or improper benefits in any form;
- Not offer or accept gifts, hospitality, entertainment, travel arrangements, or sponsorships, that are unreasonable or inappropriate or could influence, or reasonably be perceived as influencing, business decisions;
- Not conduct, facilitate, conceal, or support corrupt practices or improper benefit transfers through any third party, including but not limited to agents, distributors, consultants, introducers, or other intermediaries, regardless of whether Bluestar Silicones personnel are directly involved or not.

Human Rights, Labor, and Employment Practices

- Establish and implement appropriate health and safety management systems, comply with applicable laws and regulations, provide a safe and healthy working environment, and take measures to prevent occupational injuries and health risks;
- Respect employees' dignity, privacy, and lawful rights, foster a fair and inclusive workplace, and not engage in or tolerate any form of discrimination, harassment, abuse, or other unacceptable conduct based on legally protected characteristics;
- Comply with applicable labor laws and regulations, provide fair and lawful wages and working conditions, observe minimum wage and working-time requirements, and respect employees' rights to freedom of association and collective bargaining, without adverse treatment based on union membership or activities;
- Not use child labor or employ individuals below the legal minimum working age;
- Limit hazardous and night work to persons over 18 years of age;
- Except where local law provides otherwise, enter into written employment contracts with employees in a language they understand, clearly defining terms and conditions of employment;
- Not engage in or tolerate any kind of forced or involuntary labor, modern slavery, trafficking, or other human rights violations.

Environmental Protection and Sustainable Development

- Act in accordance with the applicable statutory and international standards regarding environmental and climate protection;
- Minimize the environmental impact of their activities and make continuous improvements in environmental and climate protection;
- Set up and use an appropriate environmental management system that a) minimizes the negative impact on the environment and climate due to manufacturing processes or handling of raw materials

and b) does not destroy resources or the income base of marginalized population groups through manufacturing or withdrawal of raw materials;
- Make reasonable efforts to avoid using conflict minerals or raw materials that directly or indirectly finance armed groups violating human rights.

Data Protection and Information Security

- Protect and respect personal data (including that of employees and partners), confidential information and intellectual property by implementing appropriate technical and organizational measures to prevent unauthorized access, disclosure, misuse, or leakage;
- Not improperly disclose or misuse any information obtained during the business relationship and comply with applicable data protection and privacy laws, including but not limited to the EU General Data Protection Regulation (GDPR) and the Personal Information Protection Law of the People's Republic of China (PIPL).

Conflicts of Interest and Fair Competition

- Timely and fully disclose any actual or potential conflicts of interest that could affect their objective and impartial performance of business obligations, including those involving individuals, their family members or related parties;
- Take appropriate measures to prevent or properly manage conflicts of interest arising from economic or other relationships related to the business;
- Not engage in market and price manipulation, sham transactions or any other form of unfair or unlawful competition, nor harm market order or the legitimate rights and interests of others through improper means.

Supply Chain

- Make reasonable efforts to ensure that their Business Partners comply with this Code of Conduct or a code that contains equivalent terms.

Speak up, Audit, and Enforcement

- Establish or cooperate with appropriate speak up channels to encourage employees and relevant parties to report violations of this Code or applicable laws and regulations, ensure confidentiality and anonymity of reporting, and prohibit retaliation against whistleblowers. Bluestar Silicones' whistleblowing platform https://bluestar-silicones.integrityline.com/ can be accessed via email or call;
- Bluestar Silicones reserves the right, within a reasonable scope, to monitor, audit or investigate Business Partners' compliance with this Code, including requesting relevant documents and information or conducting on-site inspections. Business Partners shall cooperate and ensure that information provided is true, accurate and complete;
- If a Business Partner violates this Code, Bluestar Silicones may require corrective actions proportionate to the nature and severity of the violation. If corrective actions are not completed within a reasonable timeframe, or where violations constitute material non-compliance, Bluestar Silicones may, in accordance with law or contractual provisions, take appropriate measures including suspension or termination of the business relationship, without prejudice to any other rights available to the Company.

As a Business Partner of Bluestar Silicones, we hereby acknowledge and commit to complying with the requirements of this Code of Conduct:

Company Name:
Authorized Signature:
Date:
Official Stamp / Seal (if applicable):