

Code of Conduct for Suppliers and Subcontractors (“Code”)

SHOWA DENKO CARBON Holding GmbH and its affiliates (SDK CARBON) are recognized as one of the leading Carbon companies. Our aim is to provide our customers with products setting the highest quality standards while performing our work along legal, ethical and sustainable principles. Together with our Suppliers and Subcontractors we want to set the standards in our industry.

Therefore, SDK CARBON has committed to a Code of Business Conduct and Ethics that is binding for all its employees. We expect all our Suppliers and Subcontractors to equally commit to legal, ethical and sustainable behavior while cooperating with SGL Group and following the standards below.

1. Integrity

You commit to actively and forcefully counteracting any criminal or unethical influence on decisions of SDK CARBON employees, employees of other companies or public officials and to fighting any form of corruption in your company, including bribery, extortion and embezzlement.

You commit to prohibit and avoid any kind of anti-competitive activities or agreements and you stand up against illegal cartels.

You commit to providing services and goods on grounds of applicable export controls and customs regulations.

You commit to maintaining accurate and complete accounting records.

2. Social

You commit to providing working conditions that support health, safety and security at all workplaces and to implementing management systems to facilitate continuous improvement.

You commit to upholding the human rights of

workers, treating them with dignity and respect, abiding by applicable stipulations regarding employment and labor conditions and fighting in particular human trafficking or slavery, forced labor, child labor and discrimination at work place.

You hire, employ and compensate workers based on fair and legal criteria that are in line with applicable national law and international employment standards.

You comply with applicable laws and regulations regarding "Conflict Minerals" such as e.g. the Dodd-Frank Wall Street Reform and Consumer protection Act, Section 1502, or any similar EU directives or regulations or national legislation, if applicable.

3. Environment

You commit to sustainable business and apply all applicable legal standards for the protection of the environment, including required permitting, recycling, reduction of waste and prevention of hazardous releases to the environment.

SDK CARBON commits to the principles of the UN Global Compact and expects its Suppliers and Subcontractors to work towards full implementation of such principles, along with this Code, in the course of their business as well as in all companies working on their behalf.

SDK CARBON encourages its Suppliers and Subcontractors to seek guidance regarding the principles and standards in this Code. Suppliers and Subcontractors are expected to report any concerns and disclose any violation against this Code, including sharing any information and findings about potential violations or misconduct of their own employees and cooperating in any investigation.

For the purpose of disclosure, you should use the SDK Group Compliance Whistleblowing Hotline where such disclosures can also be made anonymously:

http://www.sdk.co.jp/english/about/procurment/ethics_hotline.html

Major violations as well as their non-disclosure or insufficient pursuit against the above principles and standards may lead to the termination of the business relationship on short notice. In such case, SDK Group reserves the right to claim damages for any damage caused due to such violations.

For the purpose of a mutually trustful and compliant business relationship, we expect our Suppliers and Subcontractors to actively pursue compliance with this Code and, as a sign of their commitment, declare the following:

We have received SDK CARBON's Code of Conduct for Suppliers and Subcontractors and, in addition to our contractual obligations, commit to its principles and standards.

Place, date

Signature (Supplier/Subcontractor)

Company seal

Name (in capitals), function