

Code of Conduct

Detailed Code of Business Conduct



Version 2.0

Contents

Introduction	3
From Purpose to Values	4
Our Personal Conduct.....	5
Conflicts of Interest	5
Gifts and Entertainment.....	5
Insider Trading.....	6
Our Assets.....	7
Care and Proper Use of Assets	7
Intellectual Property Rights	7
External Communication	7
Retention of Records.....	8
Our Business Conduct	9
Transparent Reporting	9
Fair Competition.....	9
Third Party Payments.....	9
Information Protection and Privacy	10
Economic Sanctions and Export Control.....	10
Our Employment Standards.....	11
Health and Safety	11
Respect	11
Harassment	11
Child and Forced Labor.....	11
Freedom of Association.....	12
Our Environment	13
Speak Up.....	14
Ask the Question	14
Reporting.....	14

| Introduction

This Code of Conduct states the values and principles that guide our work at TotalEnergies Corbion. Our Code applies to all activities we perform on behalf of our company, wherever they take place.

TotalEnergies Corbion is committed to doing business in a responsible and sustainable manner. TotalEnergies Corbion is focused on contributing towards the sustainable world of tomorrow. We want to show this commitment not just in the biobased solutions we produce, but also in every other way that we conduct our business. TotalEnergies Corbion wants to be a responsible business partner. Our Code of Conduct shows what we stand for and what our stakeholders can expect from us.

However, be aware that our Code of Conduct does not cover everything. Nor does it provide the preferred solution to every situation. As employees, we take our responsibility seriously, make well-informed, ethical decisions, and discuss issues with colleagues and managers. Our Code of Conduct is a framework to guide our decisions. It also describes minimum requirements for our conduct on behalf of TotalEnergies Corbion. It goes without saying that we always respect and abide by the laws and regulations of the countries and industries in which we operate. Each of us is expected to act in accordance with the letter and the spirit of our Code of Conduct and the underlying policies. It is the responsibility of the TotalEnergies Corbion Executive Committee to ensure that everyone is aware of the Code of Conduct and underlying policies, and that these are observed. It is every manager's responsibility to inform their direct reports.

We are encouraged to report any suspected misconduct immediately through the normal chain of command. If we feel this is not possible, or if we prefer to report anonymously, we can report to the Compliance Officer. Failing to uphold the principles of our Code of Conduct, or willfully breaching this Code, gives TotalEnergies Corbion the right to take disciplinary action, up to and including termination of employment and the involvement of law-enforcement agencies.

If you have any questions about how to interpret or apply our Code of Conduct or any underlying policy, please consult your manager or the Compliance Officer.

| From Purpose to Values

Our core belief is that PLA bioplastics can have a real and meaningful impact toward creating a better planet for current and future generations. The biobased nature of PLA means that it reduces our carbon footprint while also contributing to the circular economy through mechanical and chemical recycling. The compostability of PLA enables the reduction of greenhouse gas emissions via diversion of organic wastes from the landfill through industrial composting.

To make a significant impact, we will help our customers to grow their businesses and thereby grow the market. We intend to grow rapidly and profitably without unnecessarily negatively impacting the environment, our neighbors, our employees, our suppliers, or our customers.

Our external stakeholders engage with us primarily because our primary focus is sustainability and so it is incumbent to hold ourselves to the highest levels of integrity and to require our suppliers do similarly. Like any business that strives to be sustainable, but even more so because sustainability is at the core of our very purpose, we refrain from and actively reject inappropriate behavior, either individually or as an organization.

The values we as an organization cherish are:

Safety

Safety encompasses everything we do. If there is not a safe way of doing it, we will not do it. This covers what we do as employees and as a company. As well as ensuring we ourselves do everything safely, on the job and in our daily life, we should look out for our colleagues and partners to ensure they also act in accordance with the most stringent safety principles.

Integrity

We expect the highest levels of integrity. This is not just obeying rules, laws and regulations, but also circles back to our purpose of having a real and meaningful impact in terms of sustainability through the products and solutions we provide. We believe that integrity is the cornerstone of credibility and a pre-requisite for success.

We enable others to do good

We cannot achieve our goals in isolation. Our products on their own do not in themselves make the world a better place. Only when we 1) buy the right feedstocks, 2) supply customers who can replace less sustainable materials or develop new applications that are in themselves sustainable, or 3) help customers find or develop better and more secure end of life solutions will we be making a real difference. By helping others we help ourselves and the environment.

Ambition

Creating a different world for future generations requires ambition and perseverance. Creating change is never easy, especially for a new entrant, but now is the time to address the sustainability challenges that our planet faces. We set ambitious and challenging targets knowing that making a difference requires quantum leaps rather than only small iterative improvements. While we are also aware of the pitfalls and the need to be humble, we have the ambition to capture the opportunities in order to successfully achieve our purpose and make a positive contribution to the world.

| Our Personal Conduct

Our personal conduct reflects on TotalEnergies Corbion, as we are all representatives of TotalEnergies Corbion. As representative professionals, we refrain from activities that could harm the performance or reputation of TotalEnergies Corbion or that of its employees. Together, we are all responsible for the performance and reputation of TotalEnergies Corbion.

TotalEnergies Corbion rejects bribery and corruption in all forms, whether public or private.

Conflicts of Interest

As employees, we must ensure that our personal activities and interests do not conflict with our responsibilities towards TotalEnergies Corbion. We should even actively avoid the appearance of a conflict of interest where possible. Examples of possible conflicts of interest are asking a personal favor from a subcontractor, using TotalEnergies Corbion's resources or reputation to pursue personal gain, using TotalEnergies Corbion information for non-TotalEnergies Corbion use and conducting business on behalf of TotalEnergies Corbion with a person close to you. If any of us has a personal interest that may affect or can be perceived as affecting our professional conduct or objective decision making in the interest of our employer, we will inform our manager.

Gifts and Entertainment

At TotalEnergies Corbion, we are committed to maintaining good relations with our customers, suppliers and other business partners. In this context, we acknowledge the business custom of exchanging small gifts, such as a bottle of wine and invitations to dinner or social activities in order to build goodwill or show appreciation. However, we must ensure that the gifts and entertainment that we offer or receive are not, or could not be perceived as, a means of gaining improper influence or creating a relationship of dependency. Gifts and entertainment may come in various appearances. Gifts include, amongst others, tokens of appreciation, Christmas presents and promotional gifts. Entertainment includes, amongst others, invitations to dinners, promotional events, site visits, sports and cultural events.

When we give or accept a gift or entertainment, which has to comply with the relevant applicable laws and regulations, we do this openly and after careful consideration. Acceptable gifts and entertainment must have a legitimate business purpose, represent an appropriate value, be appropriate to the business relationship and not embarrass TotalEnergies Corbion if publicly disclosed. We should always make this assessment prior to accepting or receiving any gifts or entertainment. Furthermore, all gifts and entertainment offered and received should be recorded in the appropriate register.

More information on what constitutes acceptable gifts and entertainment, and for which gifts and entertainment prior management approval is required, can be found in the 'Gifts, Entertainment and Third-Party Payments' policies.

Insider Trading

Inside information is information that is important enough to affect (upwards or downwards) the price of shares and other securities if it becomes publicly known. By law, none of us are allowed to trade shares or other securities of Total or Corbion (TotalEnergies Corbion's parent organizations) on the basis of inside information, nor should we disclose inside information to others who could use it to trade in securities.

| Our Assets

TotalEnergies Corbion owns tangible and intangible assets that are used to achieve our mission. As responsible employees, we must use these assets in the way they are intended and safeguard them from misuse or damage.

Care and Proper Use of Assets

TotalEnergies Corbion has entrusted us with assets, such as computers, to conduct our job properly. We will keep such assets safe from loss or damage and use them for their intended business use. If our employment at TotalEnergies Corbion ends, we will return TotalEnergies Corbion's assets that were entrusted to us. These principles equally apply to assets that our business partners entrust us with.

We also have a responsibility to use the company's cash wisely. Therefore, we adhere to the Expense and Travel Policy.

Intellectual Property Rights

As TotalEnergies Corbion, we own various kinds of intellectual property, such as patents, trademarks, copyrighted works and technical and business trade secrets, which constitutes confidential information. This property is what gives TotalEnergies Corbion its competitive edge in the market. We should treat such confidential information with caution and due care and only disclose this with prior approval from senior management and if the other party has signed a confidentiality agreement. Even after our employment ends at TotalEnergies Corbion, we should continue to protect confidential information and not disclose it without prior authorization.

Furthermore, we will respect and not infringe upon the intellectual property rights of third parties, and treat confidential information of third parties with due care and in line with relevant confidentiality agreements. Outsiders might intentionally use TotalEnergies Corbion's portfolio of brands or trademarks to market counterfeit products that are often inferior to our own. We should all be alert to counterfeit products and report any infringement to ensure that our brands are only associated with our high standards.

External Communication

To strengthen our reputation, we should be conscious of what we communicate about TotalEnergies Corbion and our activities. Statements and rumors, on the Internet or elsewhere, can easily develop a dynamic of their own and hurt our reputation. Therefore, we will use common sense when we communicate with others, including online or through social media. We will refer any media request to the communications department.

Retention of Records

Our records form the basis to meet our legal, financial and managerial obligations. To ensure that important files remain accessible as required by local laws and regulations, we administer, preserve and delete or destroy our files in accordance with the following principles:

- Save records for the periods prescribed by applicable laws and regulations. The majority of records need to be retained for 7 years but some documents may require a longer time-frame. (e.g. Health and safety records sometimes need to be saved 40 years.)
 - We may not knowingly destroy records, which need to be retained, with the intent to obstruct or influence any litigation, investigation or proper administration of any matter within the jurisdiction of any governmental authority. If we believe TotalEnergies Corbion faces potential litigation or a regulatory investigation we must immediately notify the Legal Department. In that situation, all Records should be preserved and any destruction activities must be suspended.
 - If you are unsure how to act, please contact the Legal Department.
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| Our Business Conduct

We conduct business using 'fair-play', meaning we are ambitious and competitive in our industries, but abstain from unethical practices such as exchanging confidential business information. We are a transparent and reliable partner for all our stakeholders.

Transparent Reporting

TotalEnergies Corbion is committed to being a transparent company. Our shareholders, stakeholders and other relevant parties can and should expect timely and reliable information about our activities, structure, financial situation and business performance. All of us have the responsibility to ensure that we accurately record any transactions and report inaccuracies. Making false or incomplete entries in our records is never justifiable, nor is keeping secret accounts in or outside TotalEnergies Corbion.

Fair Competition

At TotalEnergies Corbion, we are fully committed to fair competition. We see this commitment as essential to the welfare of TotalEnergies Corbion and that of our stakeholders. To this end, we will not exchange or discuss information with competitors regarding prices, market shares or other business confidential information that could harm or improve TotalEnergies Corbion's commercial position. We will reject any offer to divide the market with suppliers, competitors or customers. More information on how to deal with competitors, suppliers or customers can be found in the Competition Law Policy.

Third-Party Payments

At TotalEnergies Corbion, we insist on responsible and honest conduct in all aspects of our business. To this end, we do not offer, give or accept, directly or indirectly, improper advantages for business, personal, or financial gain. When payments are made, these should always be recorded in the appropriate ledgers.

Employees and representatives are prohibited from making, offering or authorizing facilitation payments of any kind, even if they are commonplace in a particular country. Facilitation payments are small payments made in money or in kind to government officials, in accordance with publicly known or widely followed local customs, to expedite performance or routine government actions (such as obtaining official documents, processing importing/exporting papers etc.).

Payments to representatives in the form of remuneration (such as commissions for agents) should always be proportionate to the services rendered, cannot exceed normal local business rates and practices and should always be made via bank accounts in the name of the contracting party. No part of such payment shall be passed on, directly or indirectly, to government officials, clients, suppliers, or prospective clients/suppliers.

We do not make contributions to political parties or politicians. Charitable donations and sponsorships must be carefully considered and always require prior management approval, following TotalEnergies Corbion's "Donations and sponsorships" rule.

Information Protection and Privacy

Our customers, business partners, colleagues and other stakeholders entrust us with confidential commercial or personally identifiable information. We have the responsibility to treat this information with care, limit access to persons on a 'need to know' basis and respect the privacy of those concerned. The Data Protection Policy contains more information.

Economic Sanctions and Export Control

At TotalEnergies Corbion, we are committed to complying with all economic sanctions and embargoes imposed by the UN, USA, EU and local laws that apply to us. We will neither associate nor operate or make transactions with individuals and companies listed on the designated persons lists of these countries and organizations.

We will not operate or make transactions in the industrial sectors that are listed as being prohibited by these countries or organizations.

To protect our employees and our business from criminal prosecution and civil claims, we will refrain from doing business in countries or with individuals qualified as "Restricted" and which are outlined by the US and EU Economic Sanctions Policy lists.

We will comply with the US and EU Export Control regulation.

| Our Employment Standards

At TotalEnergies Corbion, we want to partner and collaborate with our employees to achieve our vision. TotalEnergies Corbion recognizes the responsibility we have as a company to all our employees to ensure a safe and respectful work environment where their human identity and dignity are respected. Realizing TotalEnergies Corbion's vision can only become a reality with the full cooperation and dedication of all employees and when everyone feels responsible for the respectful culture, performance and reputation of TotalEnergies Corbion.

We are committed to respect internationally recognized Human Rights standards in the countries where we work.

Health and Safety

TotalEnergies Corbion is committed to provide a safe and healthy working environment for all our employees, contractors and visitors on our sites and offices. We believe that all accidents and injuries can be prevented. We want everyone to go home safely at the end of each working day. On our premises we will take all necessary steps to ensure a safe work environment. All employees are expected to be aware of and adhere to the applicable TotalEnergies Corbion health and safety programs and regulations.

Respect

TotalEnergies Corbion is committed to continuing to create a diverse work environment in which we operate on the basis of respect. We will recruit, employ and promote employees on the basis of their qualifications and suitability for the job. We do not tolerate discrimination in any form against any employee or applicant on the basis of race, religion, gender, age, sexual orientation, disability, etc. and allow our employees the free practice of their religion.

Harassment

We strive for a work environment where all employees feel safe while performing their duties. At TotalEnergies Corbion, we strive to banish harassment or intimidation by our employees or the employees of our customers, suppliers or other partners in any form.

Child and Forced Labor

We will not use any form of forced, compulsory or child labor, and we do not wish to conduct business with parties that do. All of us are free to terminate our employment at TotalEnergies Corbion upon reasonable notice.

Freedom of Association

At TotalEnergies Corbion, we respect the legal rights of employees to organize themselves. We will not discriminate or retaliate against any colleague based on his or her personal preference to either organize or refrain from organizing. We also encourage employees to feel free to work directly with their managers and human resources leaders to address any personnel issues or other issues of concern.

| Our Environment

As a leading supplier of biobased products, TotalEnergies Corbion recognizes that its continued success is dependent on our natural environment.

At TotalEnergies Corbion, we are committed to operating in an environmentally responsible manner. We strive to minimize the impact of our operations on their surroundings. We continuously seek to improve our environmental performance by minimizing the use of raw materials, energy and water, the emission of greenhouse gases and the production of waste. We measure and report on our impact and strive to implement best practices at all of our facilities. We share relevant knowledge and expertise with our suppliers, customers and other partners. It goes without saying that we comply with applicable legal environmental requirements.

As employees, we have a proactive mind-set towards the protection of the environment.

| Speak Up

TotalEnergies Corbion's performance depends on the right focus and sound decisions. This is why TotalEnergies Corbion fosters a culture where employees feel the freedom and the responsibility to Speak Up, to ask questions, to discuss dilemmas and to report suspected misconduct or violations of our Code of Conduct and any underlying policy. We are all expected to act in accordance with the principles stated in our Code and to apply them in good faith. When in doubt, we should refer to the relevant policies for further guidance. However, not every situation that we face can be covered by this Code or these policies. In such cases, we use our common sense and good judgment and ask the question...

Ask the Question

If we are unsure what to do in a certain situation, we should ask ourselves the following questions:

- Does it feel right?
- Have I sought other opinions or required permissions?
- Do my colleagues think positively of my decision?
- Is it consistent with the Code of Conduct?
- Is it legal?
- Will media coverage of my conduct benefit TotalEnergies Corbion's reputation?

If the answer is "no" to any of these questions, do not do it. If we are still unsure which decision to make, we should discuss with our manager or our Business Conduct Coordinator.

Reporting

We are encouraged to report any suspected misconduct immediately through normal reporting procedures. This means we contact first our manager. If they are not available, we can also reach out to the TotalEnergies Corbion Compliance Officer.

We will be protected against retaliation if we report concerns about suspected misconduct in good faith, even if it turns out to be unfounded.
