

CORPORATE CODE OF ETHICS

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01 A message from the CEO



Konstantin
Notman
CEO of OCSiAl Group

OCSiAl's aim is to create value for society and to maximize our positive impacts on the people and planet.

Each of us plays an important part in making our company a trusted and credible partner. Our Corporate Code of Ethics defines the values by which we want to operate our business.

Compliance with the Corporate Code of Ethics helps to ensure that we embed our values in our day-to-day work.

02 Introduction to the corporate code of ethics of OCSiAl Group



OCSiAl Group is the world's largest manufacturer and supplier of graphene nanotubes and products based thereon. In addition to the synthesis of nanotubes themselves, we are developing technologies for their use in industry to improve specific properties of various materials and to create new record-setting nanoaugmented materials.

OCSiAl Group cares about the way in which we achieve our goals and deliver on our mission. This Corporate Code of Ethics of OCSiAl Group (hereinafter also referred to as the "Code") is our commitment to operate ethically and transparently, and it outlines the standards and behaviors that help shape

O

Open-mindedness
and innovative-
ness in all
aspects
of our work

C

Competence and professionalism:
delivery of
excellence and
continuing
development

S

Supportiveness and respect:
help and encour-
age colleagues in
their initiatives

i

Integrity:
building a trustful
environment

A

Accountability and initiative:
a proactive and
independent
approach when
performing work

I

Leadership:
we aspire to be
pioneers in the
advanced
technologies

Our approach to operating ethically also extends to our partners. All business carried out with or on behalf of OCSiAl Group should be conducted in accordance with the Code as well as with applicable laws and regulations in the country of business.

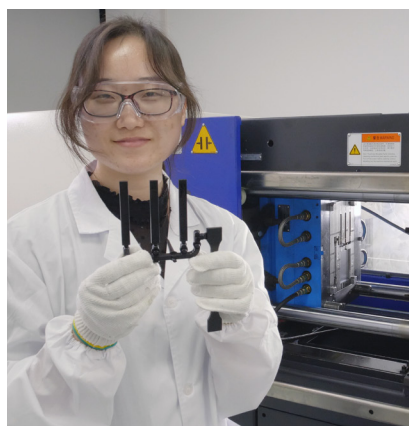
This Code cannot cover every eventuality of business ethics concerns and legal contexts in different countries. If specific situations are not expressly covered in this Code then, when deciding on its implementation in each specific circumstance, the Code's spirit must be upheld by exercising common sense and sound judgement, always in compliance with applicable laws.

03 Our mission

To change all materials and make the world better

OCSiAl's mission is to improve specific properties of all base materials,* making the world a better place for all living beings.

We are pursuing this mission by developing universal nanoadditives and introducing them into the manufacturing industry. This is leading to the creation of a new generation of nanoaugmented materials and end products whose previously unobtainable properties will become the standard for consumer expectations.



Enhancing specific properties of materials radically reduces their “price per property”. Fewer actual materials will be needed to create more effective products. This fundamental shift will play a crucial role in the necessary reduction of carbon emissions, helping to halt the degradation of our biosphere and allowing people throughout the world to raise their quality of life and more fully reap the benefits of modern civilization.



*Base materials are materials with a chemical composition substantially different from that of raw materials and with an annual worldwide production output exceeding 0.1 million tonnes.

04 Implementation of the code

This Code shall apply to OCSiAl S.A., all legal entities controlled by OCSiAl S.A. (whether directly or indirectly), and to all of their respective employees.

For the purpose of this Code:

1

any reference to “OCSiAl Group” shall mean a reference to OCSiAl S.A. and all legal entities controlled by OCSiAl S.A. (whether directly or indirectly) taken as a whole;

2

any reference to the “Company”, “employer”, “we”, “us”, “our” shall be deemed a reference to any of (1) OCSiAl S.A. and (2) each legal entity controlled by OCSiAl S.A. (whether directly or indirectly), as may be applicable; and

3

any reference to the “employee” shall be deemed a reference to, and shall cover any, employee of (1) OCSiAl S.A. and (2) each legal entity controlled by OCSiAl S.A. (whether directly or indirectly), as may be applicable.

It is expected that all employees, contractors, consultants and other people who may be engaged by the Company or are acting on its behalf shall know this Code and shall act in line with its spirit. In addition to this Code, the Company has adopted the Corporate Code of Conduct of OCSiAl Group which sets out basic standards and guidelines on how employees of OCSiAl Group shall act in performing their job duties in order to meet the ethical standards set out in this Corporate Code of Ethics.

This Code does not prohibit legal entities controlled by OCSiAl S.A. from adopting their own codes of ethics provided always that such codes shall not be in conflict with, and shall be based on, this Code. Any such code of ethics, in case developed and adopted by any legal entity controlled by OCSiAl S.A., shall apply only to the employees of the respective legal entity controlled by OCSiAl S.A. and shall be in addition to this Code and shall not supersede it.

05 People

Respect for the dignity and rights of all people is a cornerstone of our business excellence. At OCSiAI Group, we do our best to apply the most advanced practices in the field of human resources in order to protect our employees.

Health and safety at work

We value human life and health. We recognize our responsibility to maintain the health and safety of our employees and of other people who may be involved with or affected by activities of OCSiAI Group. We strive to ensure safe working conditions in strict compliance with health and safety regulations. We do so by routinely considering potential health and safety risks and by implementing sound health and safety methods in our operations.

Equality, diversity and inclusion

We praise diversity and believe that each individual can bring fresh ideas and approaches to improve our performance and increase the potential for development. In accordance with this we promote diversity and provide all employees with the opportunity for career and personal development entirely on the basis of abilities, qualifications, and suitability of an individual for the particular job.

Discrimination and harassment

We say no to discrimination and harassment at OCSiAI Group.

The Company treats all employees equally and does not tolerate any kind of discrimination, whether based on race, color, gender, religion, national origin, ancestry, pregnancy status, age, marital status, or any other grounds.

The Company is committed to providing all of its employees with a safe work environment free from all forms of harassment, including sexual harassment. No conduct that is unwanted or offensive and affects the dignity of an individual or group of individuals is allowed at the Company.



06 Business integrity

We conduct our business in a fair, ethical and responsible manner in full compliance with applicable laws and regulations.

OCSiAI Group is a trustful partner that upholds the principles of responsible partnership and aims at building long-term mutually beneficial relations with all of its partners.

Fair competition

- We are committed to making all efforts to promote fair and vigorous competition. We believe that fair competition provides the best incentives for business efficiency and we avoid anti-competitive conduct.
- The Company will compete within appropriate legal boundaries on the basis of quality, service and pricing, and will not enter into agreements with competitors or customers that restrict or limit competition in the marketplace.

Bribery and corruption

- We do not tolerate bribery and corruption. OCSiAI Group has a strict anti-bribery and anti-corruption policy. To combat bribery and corruption, the Company strictly complies with all applicable laws and regulations aimed at eliminating all forms of bribery and corruption.

Anti-money-laundering and counteracting the financing of terrorism

- OCSiAI Group supports international efforts to combat money laundering and the funding of terrorist and criminal activities. In order to ensure this, the Company strictly follows all laws against money laundering and terrorism financing that are in place in the majority of countries worldwide.
- The Company always checks the identity of its customers and suppliers, and conducts business only with reputable partners who operate in line with applicable laws and regulations.

Conflict of interest

- At OCSiAI Group we always make decisions on the basis of the Company's best interests rather than personal considerations or relationships. A conflict of interest can arise when personal interests or relationships of an employee overlap with their job duties.
- Employees shall always separate private interests from those of the Company and shall act in such a manner as may be required in order to ensure that the Company's best interests are preserved. Our personal relationships and interests should never affect our business activities or influence our decision-making, in any way.

Insider trading

- We never use nonpublic information for any purpose other than for the purposes related to the business activity. No nonpublic information may be used for insider trading. Under no circumstances it may be used, either directly or through third parties, for trading purposes or in order to give advice to others to acquire or sell securities.

Recordkeeping and document storage

- Our records provide valuable information for the business and evidence of our actions, decisions and obligations. Our records shall always be clear, accurate and complete. All of the Company's accounting records and supporting documents reflect the nature of any underlying transactions.
- The Company strives to ensure that all transactions are recorded accurately, without creating any misleading information. We publish our financial statements on time and in compliance with applicable national and international accounting regulations.

Gifts

- We do not consider it appropriate to accept or grant a personal benefit of any kind in connection with our professional activities.
- We do not accept or provide gifts or hospitality in return for any business, services or confidential information, or with the intent to bias a decision.
- If we exchange gifts, hospitality and invitations, we do so appropriately and responsibly. We never accept or make payments of money as a gift. We also never accept or provide gifts of any nature in order to interfere with the independence of judgement or other actions in the course of performance of our job.

Political activities

- The Company does not support, finance, or otherwise contribute to, any political organizations, political parties, or any candidate for political office, and it does not participate in any political activities. The Company interacts with all authorities (whether state or local) and officials in strict compliance with all applicable laws and regulations.
- When we do interact with any political parties or interest groups, we always do so on the basis of the principle of neutrality. We never attempt to dishonestly influence policymakers and government.

The intellectual property

- The intellectual property of OCSiAl Group includes a variety of properties, such as technical documentation, logos, inventions, know-how, and patents. We take great care to protect our intellectual property, as it is an asset of utmost value to OCSiAl Group. We use best practices and protective measures in order to safeguard our intellectual property against unauthorized access and imitation by others.
- Similarly, we respect the intellectual property of third parties, including competitors, suppliers and customers.

Privacy and confidentiality

- Handling data carefully is essential for building and maintaining a trusting relationship with both employees and customers. We respect the value of information, whether owned by the Company or by any other person.
- The Company carefully observes special statutory rules that are in place to protect privacy and confidential information, including when dealing with personal data (for example, the EU's General Data Protection Regulation).
- The Company only records, processes or uses personal details if permitted by law or if the person involved has given permission.
- Disclosure of the Company's confidential information may harm our competitiveness and disclosure of confidential information of people we do business with will result in loss of trust. Just as we are careful not to disclose confidential information of the Company, we equally treat with care any confidential and personal information of our partners and employees.

07 Sustainability

We conduct our business with the recognition that we all live together on a planet with limited resources. Making the most of the resources we have and accelerating progress on efficient solutions are embedded in our values.

Environmental impact

While we are aiming to reduce carbon emissions with the use of our products, we also intend to reduce the footprint of OCSiAl Group's own operations on the environment. In our business activity we comply with all applicable environmental legislation and incorporate energy-efficient measures into our business activity.

Our top priority is to ensure health and safety

Health and safety of our products

At OCSiAl Group our top priority is to ensure the health and safety of our employees, partners and customers.

As the world's largest producer of graphene nanotubes, OCSiAl is taking a leading role in improving transparency of the nature of graphene nanotubes and in formulating methods for handling them responsibly. The company has an ongoing policy of initiating its own as well as external independent testing and research, and it has already accumulated a significant knowledge base on the morphology of nanotubes produced by OCSiAl Group, and on their safe handling and use in the workplace and in manufacturing. Nanotubes produced by OCSiAl Group are compliant with all the relevant international, national and regional requirements of the world's key markets, including the EU and the USA.



08 Reporting options

In addition to reporting to an employee's immediate supervisor or HR department, any information on damage to the Company's interests or on breaches of this Code may be reported to the following email address:

report.conduct@ocsial.com

ocsial.com

tuball.com