CODE OF CONDUCT

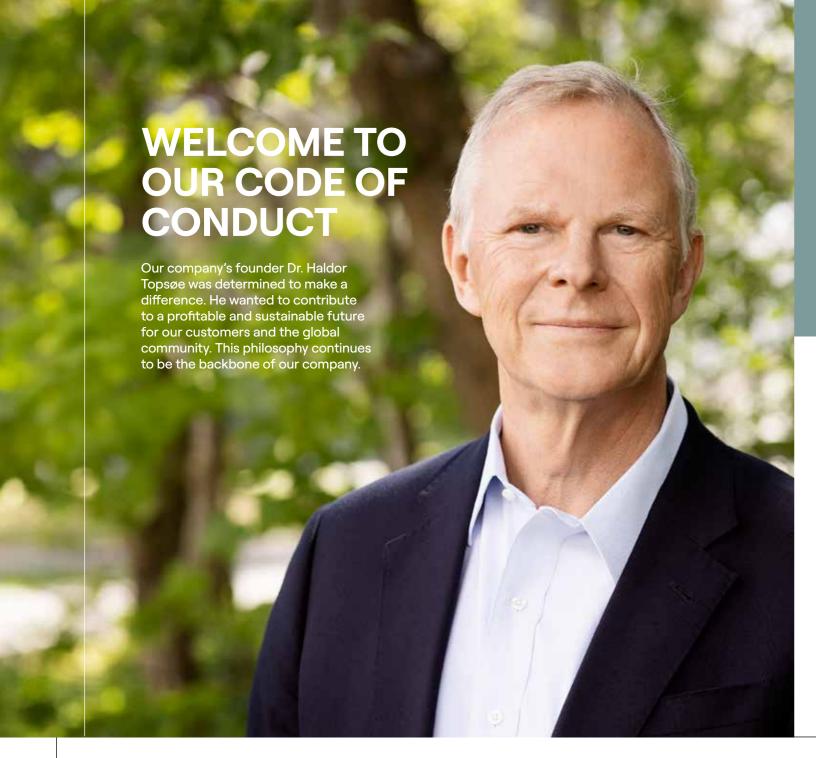


TOPSOE



CONTENTS

Welcome	3
The Topsoe Spirit	4
How to use this Code of Conduct	5
Zero Harm	6
Compliance and Transparency	7
People	8
Environmental Protection	9
Information Security	10
Confidentiality	11
Financial Integrity	12
Anti-corruption, Gifts, Conflicts of Interest	13
Business Partners	14
Trade Sanctions and Export Controls	15
Fair Competition	16
Speaking Up	17
Sustainability at the Core	18



Together with our values, our Code of Conduct serves as a compass, pointing us toward the right actions and decisions, both individually and collectively.



Welcome to our Code of Conduct

At Topsoe, we're a team of problem solvers dedicated to making energy transition and moving society towards net zero. Together, we provide technology and solutions for the energy transition, enabling our customers to reduce their climate impact and emissions, and overcome some of their most pressing challenges.

Acting ethically and with integrity and minimizing our environmental impact are paramount to us, which is why our Code of Conduct is so important. Alongside the Topsoe Spirit – our four values – it guides our actions and behaviors, helping us earn the trust of those around us and protecting our reputation.

This Code of Conduct serves as a guide and reminder for every Topsoe colleague worldwide. It's our go-to resource when we're navigating complex, uncertain and unstable situations that put pressure on the individual to make decisions and act. It also represents our commitment to our customers and stakeholders, outlining the standards of what to expect from Topsoe.

It takes a collective effort to stay true to our purpose of Perfecting Chemistry for a Better World, so please take the time to carefully read and understand our Code of Conduct. And from time to time, read it again. It's about doing the right thing and being good role models.

Let's lead by example while we're making energy transition.

Roeland.

Roeland Baan CEO

THE TOPSOE SPIRIT

The Topsoe Spirit – our values – is at the very heart of our company. Together, these values guide us in how we interact with each other, our customers and the world around us and serve as the compass for our actions and decisions, both individually and collectively.



We have the ability, privilege and the obligation to use our scientific expertise as the foundation for our business in order to create a better world.



We go the extra mile to create lasting value for our customers.

We listen to our customers' needs in order to deliver the best suited solution for the future as well as for the present. And we are persistent in the pursuit of success.





We enable clean, efficient processes that minimize the impact on the environment and climate for the benefit of humanity.



We strive every day for Topsoe to be a great place to work.

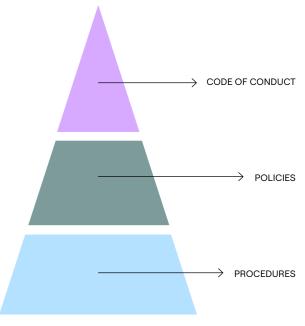
We rigorously seek to gain the trust and respect of others and embrace the opportunity to develop ourselves in a community of great colleagues.



HOW TO USE THIS CODE OF CONDUCT

This Code of Conduct sets out the conduct and behavior that is expected in Topsoe A/S and majority-owned subsidiaries ("Topsoe") and addresses the issues that are most critically important for our business.





Who should follow this Code of Conduct?

We expect everyone employed by Topsoe, including our Board of Directors, to follow this Code of Conduct whenever acting on behalf of Topsoe. All at Topsoe have an additional responsibility to act with professional integrity and as a role model to our colleagues. We also expect all third parties to act in line with the principles described in this Code of Conduct, and to comply with applicable laws and regulations, whenever they work for or with Topsoe.

Our responsibilities

Although the Code of Conduct is a comprehensive commitment, it cannot address all situations. You are expected to use a common-sense approach and to seek guidance, not only in the Code of Conduct, but also in the underlying policies, procedures, business processes, instructions and other tools which are available on the Topsoe intranet GLOBE, in Topsoe's global business document repository SOPHIA, or in our work process quality management system, the Hub.

In case of discrepancies between this Code of Conduct and other internal requirements or local law, the strictest rules must always be followed.

If you are ever unsure of what to do in a certain situation or if you have concerns that this Code of Conduct, our policies, procedures or processes, or any applicable laws or regulations have been or might be violated, you must speak up. Report your concerns to the relevant Topsoe leader or contact person, to Legal, HR, or Compliance – or if you choose, raise them through the Topsoe Compliance Hotline.

The consequences

Failure to comply with this Code of Conduct, the policies and procedures of our business, or applicable laws and regulations can have severe consequences, both for Topsoe as a company and for us as individuals. For Topsoe employees, such failures to comply may lead to disciplinary sanctions, from mandatory re-training up to and including summary dismissal, depending on the specific circumstances. Violations of the law may also lead to civil or criminal sanctions for involved individuals, our company, or both.



Our standards

Zero Harm is a joint responsibility that we share, regardless of our position or location. That's why we are all Zero Harm leaders, carrying the Zero Harm mindset in everything we do. This means that we prioritize safety and mental well-being, and we take responsibility for our actions, both individually and collectively. We also think about how we can act environmentally responsibly.

We encourage our people to take an active part in our joint Zero Harm culture and journey, by addressing unsafe behavior to suggesting improvements to simply sharing their thoughts, ideas, and experiences.

Safety, well-being, environmental

or execution, and at closeout.

impacts, and security must be taken into consideration in every business activity,

from planning, to start-up, during operation

We rely on observations and information from our people to monitor our progress and make data-driven decisions. This helps us create safe and secure working environments that comply with all applicable health and environmental standards.

To safeguard the health and security of our people, our partners, and the planet, we continuously assess quality and mitigate safety and environmental risks of our products, engineering designs, and production processes. We always provide relevant safety and security instructions and awareness briefings

to our people, including external contractors working for and with us. And we collaborate with relevant stakeholders, including our customers, suppliers, regulatory bodies, and local communities, to continuously improve our high safety standards and drive positive change.

We always have the mandate to stop work if the conditions are not safe.

Your responsibilities

- → Care for your own and others' well-being, safety, and security
- → Act responsibly, promptly reporting all safety incidents
- → Use your Zero Harm authorization to stop work if ever you believe the conditions are unsafe
- → If you think that safety concerns are not being properly addressed, report them to a Topsoe leader or via the Topsoe Compliance Hotline

COMPLIANCE AND TRANSPARENCY

Compliance with applicable requirements is fundamental to our long-term success and the values of Topsoe. Simply put, it is our license to operate.

Our standards

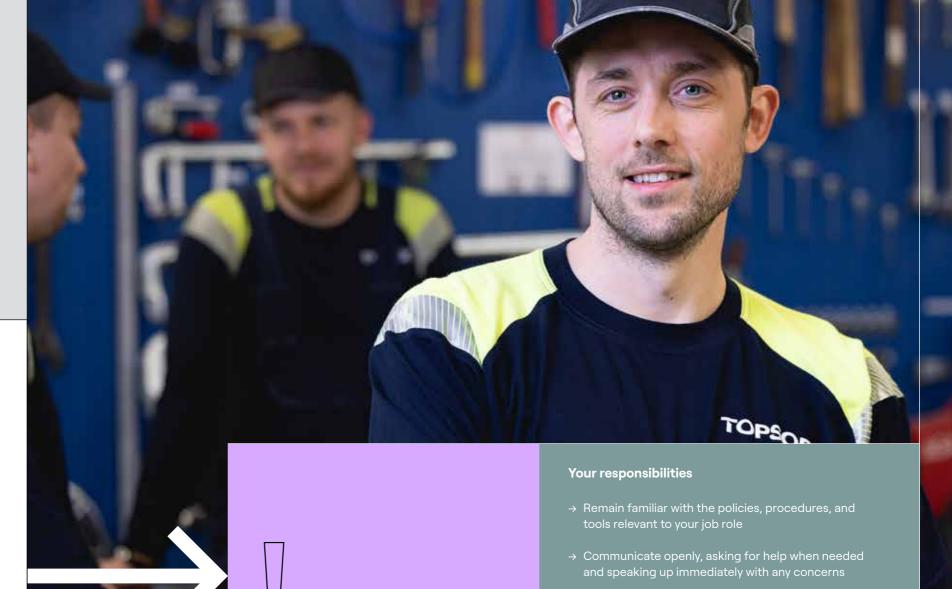
It is our policy to conduct all our business in an honest and ethical manner, complying with all applicable laws, regulations, and other stakeholder requirements, and applying responsible standards where relevant laws and regulations are lacking.

We are dedicated to meeting the requirements of our customers, business partners and other stakeholders, and we focus on building long-term relationships based on integrity, trust, and respect.

We maintain an effective corporate governance structure and encourage open dialogue amongst all employees and at all levels of the organization. We structure our business so that compliance with applicable laws, our high ethical standards, and our principles of transparency are designed into our standard ways of working.

We communicate clear guidelines and provide recurrent training in relevant business requirements, including laws and regulations as well as local standards. Our agreements are made in writing.

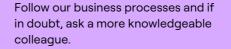
We encourage and expect everyone at Topsoe to consult the relevant colleague or leader whenever needed to act appropriately in a given situation.



→ Focus on the needs of our customers and other business partners, while remaining loyal to Topsoe and true to our ethical standards



→ Complete all required training within assigned deadlines



CODE OF CONDUCT

CODE OF CONDUCT

PEOPLE

Fostering a culture of diversity, equity, and inclusion is essential to our success, and we recognize that only in a healthy and safe work environment can our people reach their full potential.

Our standards

Our people are the key to our success, and we are dedicated to creating a great place to work that benefits all Topsoe colleagues around the world. We believe that engaged and motivated employees, who work in safe and secure conditions, are essential to reaching our ambitious targets and maintaining our innovative edge in the green transition.

We are committed to creating the best possible workplace – a place where people thrive together. Each day, we strive to foster a welcoming, healthy, and inclusive work environment that respects diversity and individual characteristics. We empower our people to achieve

our ambitious targets through engagement, loyalty, and motivation. Guided by the principle that all people should be treated with dignity and respect, we never tolerate discrimination, harassment, violence, bullying, or any other form of misconduct.

To create a great place to work, we offer equal opportunities for professional and personal growth, so that everyone at Topsoe can reach their full potential, regardless of human characteristic, origin, or belief. We respect the privacy and freedom of association of our people and are committed to upholding human rights in all aspects of our business worldwide.





Engage in dialogue to make Topsoe a great place to work.

Your responsibilities

- → Be familiar with our values, the Topsoe Spirit, and take an active part in your own and others' professional development and physical safety
- → Ensure fair and equal treatment of all individuals you engage with, and always behave in accordance with our policies and principles for diversity and antiharassment
- → Actively engage in supporting a welcoming and healthy working environment, where people feel safe, valued, respected, and included
- → Speak up! Proactively address any incidents of harassment, discrimination, retaliation, or other violations of our people standards through direct feedback and/or reporting to the relevant Topsoe leader, to HR, or via the Topsoe Compliance Hotline

ENVIRONMENTAL PROTECTION

Deeply rooted in Topsoe's purpose of perfecting chemistry for a better world is a strong commitment to protecting the environment by minimizing our environmental impacts.



Protect the environment by minimizing waste, energy, and resource consumption.

Your responsibilities

- → Always perform your work in an environmentally responsible manner, for example by following our procedures for handling chemicals and participating in environmental-related training
- → Take active part in protecting the environment by continually reducing waste, energy, and resource consumption
- Consider potential environmental risks when performing your job duties, and report any incidents with environmental impact in accordance with our defined procedures
- → Report any concerns regarding potential violations of environmental laws and regulations to your direct manager or a Topsoe leader, the local environmental manager, via Topsoe's safety incident reporting tool, or via the Topsoe Compliance Hotline

Our standards

Complying with the environmental protection laws and regulations applicable to our activities is at the foundation of all that we do at Topsoe.

We are committed to minimizing the impact of our operations on the environments around our facilities by decreasing our use of resources and our emissions, and improving efficiency. We have also made the commitment to continue to reduce the life cycle impacts of our products, activities, and services — this includes their energy use, waste, water usage, and carbon dioxide emissions.

In these ways, we support sound environmental responsibility throughout the Topsoe value chain. The requirements embedded in our environmental management systems (ISO14001 and RC14001) and quality standards (ISO9001) within production drive our continuous efficiency improvements to further reduce the potential negative impact on the environment from our production. And we use a life cycle management approach to address the impact of our full value chain on the broader ecosystem.

We embrace open dialogue with employees, authorities, customers, neighbors, and other stakeholders about how our activities impact the natural environment around us.







INFORMATION SECURITY

We continuously work to keep our digital environments stable and secure.

Our valuable and sensitive information can be lost in an instant. Keep on the lookout for any suspicious digital activity, and inform Topsoe's Global IT Service Desk immediately if you discover a data breach or leak.

Our standards

We take information protection seriously in an ever more digital world. We work to ensure the digital and physical security of our information, assets, IT systems, devices, and Topsoe facilities, taking concrete actions to guard against hacking, industrial espionage, and other unwanted intrusions that could compromise our operations or information.

At Topsoe, our IT policies and information and physical security guidelines are designed to sufficiently mitigate risks to our digital environments, while still enabling efficient business processes. They help us maintain a secure environment where systems, infrastructure, tools, and physical devices contribute to our continued business success.

Our communication systems are designed to support the sharing of our business information in a secure way. We are committed to handling personal data properly and keeping it safe.



Your responsibilities

- → Always lock or turn off your computer when leaving it unattended
- → Be aware and vigilant towards suspicious emails, messages, phone calls, and websites, including unfamiliar hyperlinks and attachments
- → Use Topsoe devices and systems for the intended purposes, always keep them secure, and only acquire approved software
- → Use appropriate systems for sharing confidential or sensitive information, and never disclose such information externally, such as through messaging services, social media, or to the press
- → Protect personal data by processing, storing, and deleting it in accordance with applicable requirements
- → Report any actual or suspected cybercrimes, system breaches, or information leaks to Topsoe's Global IT Service Desk, or alternatively through the Topsoe Compliance Hotline

CONFIDENTIALITY

We protect our knowledge, and that of our customers and other third parties.

Our standards

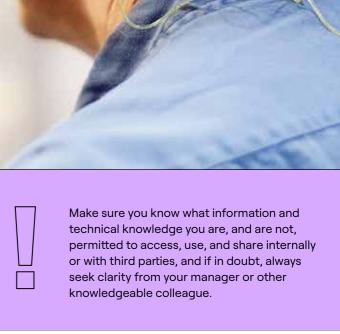
Our company is built on our unique and highly innovative solutions. And that high level of innovation strictly requires us to always keep trade secrets, confidential and strictly confidential information, including manufacturing processes and know-how, non-published inventions and patent applications, business plans, pricing information, customer and supplier lists, information about certain partnerships and transactions, and other non-public information (collectively, "Confidential Information"), secure and protected from unauthorized access. It is likewise important that we fulfil our contractual obligations in respect of Confidential Information received from third parties such as customers, business partners, or others.

We maintain strong internal controls and provide training and guidelines for securely handling Confidential Information, including preventing unauthorized internal and external access or disclosure, and entering into confidentiality agreements when appropriate.

As a general rule, we intentionally reject any third-party confidential information that in our view could lead to knowledge contamination, which in turn could potentially restrict us from exploiting future inventions or business opportunities.

Your responsibilities

- → Remain aware of which Confidential Information you have access to, and discuss with your manager if you are in doubt about how to correctly handle that information
- → Ensure that an appropriate agreement covering the specific exchange of information is in place, before disclosing or agreeing to receive any Confidential Information
- → Only disclose and/or receive Confidential Information when necessary
- → Never save, share, or use Confidential Information obtained through previous or external employment
- → Immediately inform a Topsoe leader or Legal if you have any concerns about the handling of Confidential Information, whether it is our own or a third party's – or report it via the Topsoe Compliance Hotline



FINANCIAL INTEGRITY

We are committed to always providing accurate and reliable financial records, to comply with financial accounting standards, combat fraud, and run a trustworthy, professional, and efficient business.



Our standards

For Topsoe, it is crucial to provide and maintain complete and accurate financial information, to prevent accounting irregularities, combat fraud, and avoid supporting illegal practices like money laundering.

Fraud involves illegally gaining access to company funds through deception, and examples include theft, embezzlement, and abuse of approval authority. Money laundering happens when funds gained via criminal activities are mixed with legitimate funds or otherwise made to appear legitimate, while terrorist financing involves illegally supporting designated terrorist organizations using laundered or legitimate funds. At Topsoe we do not accept money laundering or fraud in any form, and we work actively to secure that our accounts are never used to engage in or facilitate those illegal activities.

As a responsible corporate citizen, Topsoe always conducts business based on compliance with applicable tax and anti-money laundering laws and regulations, and we strive to consistently follow all relevant legal and regulatory guidelines regarding financial and non-financial accounting and reporting requirements.

We have established internal procedures and controls to ensure the consistency, lawfulness, and accuracy of our accounting and related business documentation such as purchase orders, expense reports, business partner details, and financial transactions.

We ensure objective financial decision-making by maintaining appropriate controls such as segregation of duties, and by requiring timely disclosure of potential conflicts of interest.

Your responsibilities

- → Know and follow our bookkeeping and accounting rules, including proper documentation of business expenses
- → Avoid, or if unavoidable promptly disclose, any potential conflict of interest as soon as you become aware of it, in keeping with our internal policies
- → Comply with relevant internal procedures and professional requirements regarding accounting, tax, and anti-money laundering, and seek help from Finance, Tax, and Legal

when you conduct complex and/or innovative business activities

- → Ensure that financial transactions are authorized and approved in keeping with internal policies, and sufficiently supported by relevant and accurate documentation
- → Immediately report any observed financial irregularities, concerns, or doubts to the relevant Finance manager, or via the Topsoe Compliance Hotline

We record our financial transactions accurately, with appropriate documentation such as original invoices.

ANTI-CORRUPTION, GIFTS, CONFLICTS **OF INTEREST**

We act with integrity and do our work in alignment with Topsoe's best interests. We stand against corruption because it is illegal, unfair, and wasteful.

Our standards

As a global business, we operate in countries with diverse legal and commercial contexts. Wherever we are, no matter the circumstances, we maintain high ethical standards, and do business based on compliance with all applicable anti-corruption regulations.

At Topsoe, our business decisions must always be fair and transparent, and we work actively to avoid any appearance of impropriety or conflicts of interest. For that reason, while Topsoe respects our people's right to private lives, we must all avoid situations where our personal interests improperly influence our professional decision-making at work - or where it could look that way to others.

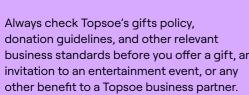
Maintaining Topsoe's good relations with our business partners and government representatives is crucial for our success as a company. In those interactions, we must always take care to protect our company against any association with real or perceived corruption. This is why we at Topsoe must always adhere to Topsoe's gifts policy, and never offer or accept gifts, meals, or anything else of value if they are or could appear to be in exchange for an undue business advantage. And we never expect or encourage our business partners to give us gifts, regardless of value.



business standards before you offer a gift, an



- → Immediately report any potential or actual conflict of interest, in keeping with our conflict of interest policy, before proceeding with an impacted work responsibility
- → Check Topsoe's gifts, hospitality, and entertainment policy before accepting or offering anyone a gift or invitation to a hospitality or entertainment event, or offering anything of value to a public official
- → Complete all assigned anti-corruption compliance training on time, including online courses and inperson awareness sessions
- → Speak up if you have concerns about whether an exchange, incident, or fact pattern is in line with Topsoe's business ethics principles, by contacting the Topsoe Compliance Hotline



BUSINESS PARTNERS Topsoe strives to cooperate with business partners throughout the world who share our commitment to quality, sustainability, clean business dealings, and transparency in our actions.

Our standards

To offer and deliver our advanced solutions and services, we at Topsoe rely on a strong network of business partners, including a robust supply chain, selected agents and distributors, and trusted collaboration partners in joint proposals, alliances, joint ventures, and other forms of partnership.

Our relationship with business partners is based on mutual trust, open dialogue, and a common commitment to follow principles of transparency and integrity in our interactions. We operate efficient sourcing and procurement processes by applying appropriate professional criteria for supplier selection, qualification, and management.

At Topsoe, we are committed to collaborating only with business partners who share our ethical and professional standards, who abide by our relevant policies, and whose actions are consistent with this Code of Conduct.

To achieve this, we conduct risk-based integrity due diligence assessments of all in-scope business partners, and we include business ethics as qualification criteria for all our suppliers, requiring them to meet the high standards described in our Supplier Code of Conduct.

Your responsibilities

- → Clearly communicate Topsoe's expectations and requirements to our business partners, evaluate their performance promptly and accurately, and be consistently proactive and accountable whenever you interact with business partners
- → Know and follow our third-party assurance policy, and get compliance due diligence approval whenever required, before engaging with externals
- → When involved in selecting and appointing agents, always ensure that our policies are followed, including supplier qualification, compliance due diligence, and prior written approval by the appropriate senior leader
- → Report any actual or potential breach of our procurement rules, compliance due diligence requirements, or related internal standards to the relevant Topsoe leader, to Legal, Compliance, or via the Topsoe Compliance Hotline



Topsoe has zero tolerance for misconduct by our business partners. We expect and rely on you to immediately report any potential violation directly to Compliance or via the Topsoe Compliance Hotline: www.topsoe.com/

TRADE SANCTIONS AND EXPORT CONTROLS

As a global company, we are committed to complying with sanctions and export controls.



Always KYC: Know Your Counterparty. It is your obligation to always seek out sufficient information about our business partners and record it accurately in our systems, thus helping Topsoe avoid sanctions violations and breaches of export controls.

Our standards

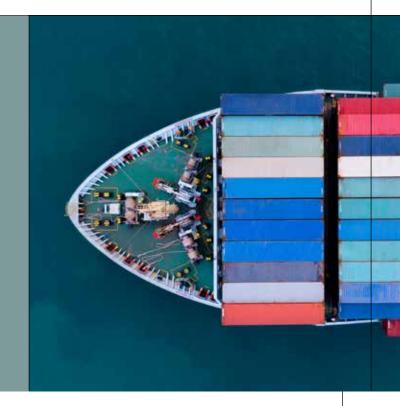
Trade is global and high-paced. Geopolitical events can impact global trade and, in that way, our business. Countries and supranational organizations can impose trade barriers such as product tariffs, export controls, and economic sanctions against individuals, groups, companies, and entire countries.

We are committed to complying with applicable export controls, sanctions, trade embargoes, and other laws and regulations governing international trade. We have policies and procedures in place designed to prevent unlicensed transfers of restricted products and

technology, and we perform risk-based compliance due diligence to identify and avoid direct and indirect transactions with individuals, groups, companies, and countries subject to sanctions. We offer training to all relevant employees to ensure that we adhere to applicable export controls and sanctions, that we know our customers and other counterparties, and that we know how to identify and handle potential suspicious activity.

Your responsibilities

- → Know your counterparty in sufficient detail and capture accurate and complete information about the end-user, end use, and all involved parties of each Topsoe business transaction
- Comply with our policies, procedures, and business processes — and complete all required training — regarding compliance due diligence, export licensing, and interactions with sanctioned and restricted parties
- → Never engage in any activity if you think or suspect that it may violate applicable export controls, sanctions, or customs laws and regulations
- → Always consult with Legal or Compliance in case of doubts, concerns, or possible breaches of law, or if preferred, use the Topsoe Compliance Hotline



CODE OF CONDUCT 15



Your responsibilities

- → Know our policy, seek guidance whenever in doubt, and take required training
- → Never engage in activities, such as agreements or concerted practices with competitors or third parties, that may violate competition laws
- → Think twice before sharing any business information with actual or potential competitors of Topsoe
- → Consult with the relevant Topsoe leader, Legal, or Compliance, or alternatively report via the Topsoe Compliance Hotline, if in doubt or in case of issues or concerns

Our standards

For us, fair competition is a necessary condition for the success of our business activities worldwide. At Topsoe, we win business on the basis of our excellent solutions and offerings, and we reject practices that restrict fair and free competition. This means we are committed to ensuring that we never abuse a potential dominance in a market, and that we avoid agreements, arrangements, or mutual understandings with competitors or other third parties if they could be considered anti-competitive.

Our policies and procedures support us to ensure that we can comply with applicable competition laws and regulations wherever we operate. We provide training to relevant employees on competition law and on how to identify and avoid prohibited activities such as forming of cartels, abuse of dominance, illegal information exchange, and other behavior that illegally restricts competition.

Participate in training to understand any 'red flags' related to cartels, abuse of a dominant market position or illegal information exchange.

SPEAKING UP AND THE TOPSOE COMPLIANCE HOTLINE

Our Code of Conduct guides our behavior at Topsoe, and we commit to follow it.

Our standards

At Topsoe we believe that speaking up is essential, and it's everyone's responsibility. Through open, direct, and respectful dialogue we stay true to our company's purpose, help our customers solve their challenges, and create a great place to work for ourselves and each other.

This means that if we know or believe a Topsoe employee's or business partner's actions could be in breach of our Code of Conduct, then we must speak up. Speaking up means giving feedback directly to the employee or business partner, or informing a Topsoe leader or the HR, Legal, or Compliance functions. And if we ever have a concern, doubt, or actual knowledge

that an activity or event involving Topsoe is unlawful, threatens human life, health or the environment, or poses a material risk to Topsoe as a company, then we can also speak up using the Topsoe Compliance Hotline.

The Topsoe Compliance Hotline is a secure online portal, administered by a third-party provider, meaning it is possible to remain completely anonymous if you choose. We ensure that incoming concerns are handled promptly, professionally, and with complete confidentiality. The Topsoe Compliance Hotline is open to our employees, customers, suppliers, and anyone else with an in-scope concern, and is accessible via our website at: www.topsoe.com/Compliance-Hotline.

Topsoe strictly prohibits retaliation,

Topsoe strictly prohibits retaliation, i.e. intentional unfair treatment, against any person for reporting their concerns to us in good faith.

Your responsibilities

- → Speak up. If you see a possible breach of our Code of Conduct, give feedback through prompt, earnest, and respectful dialogue, either directly or via a Topsoe leader, HR, or Compliance
- → If you know or believe something has occurred or could occur that breaches the law, threatens human life, health, or the environment, or poses a material risk to Topsoe as a company, speak up as described above or, if preferred, use the Topsoe Compliance Hotline
- → Never accept any retaliation against a person for speaking up in good faith about a concern

SUSTAINABILITY AT THE CORE

At Topsoe we believe in a sustainable future fueled by science.

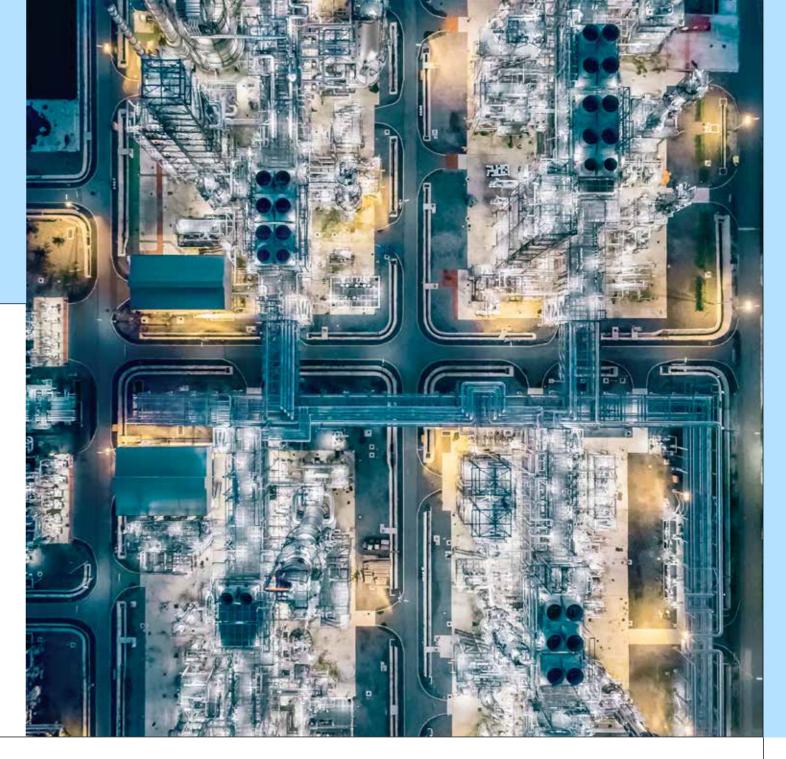
Back in 1940, Topsoe was founded on the principles of using science and engineering to make the world a better place, in a true spirit of sustainability. Today, our purpose remains perfecting chemistry for a better world. We play a leading role in providing decarbonization and emission reduction technology and solutions for the energy transition towards a more sustainable future. Sustainability sits at the core of what we do.

Topsoe is committed to doing business responsibly and sustainably. Environmental and social sustainability is an integral part of Topsoe's business operations. We address the global impact of what we do, and work on minimizing our own footprint, while continuing to deliver world-leading solutions to our customers around the globe.

Topsoe is a participant of the UN Global Compact, and we are committed to embedding the Ten Principles for responsible business conduct throughout our business and value chain. We respect the principles of the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. We strive to align our actions to the principles of the OECD Guidelines for Responsible Business Conduct and the UN Guiding Principles for Business and Human Rights. We contribute towards achieving the UN Sustainable Development Goals (SDGs), while delivering actions and solutions to support the Paris Agreement.

We take care to avoid causing or contributing to adverse impacts on people and the environment across our value chain, and continuously review how we manage our impacts via our due diligence policies and processes.

Topsoe has committed to reach net zero greenhouse gas emissions across the value chain by 2040. The target has been approved by the Science Based Targets initiative (SBTi). We rely on all employees and business partners to take active steps to help us reach the target.





About Topsoe

Topsoe is a leading global provider of technology and solutions for the energy transition. We combat climate change by helping our customers and partners achieve their decarbonization and emission reduction goals.

Based on decades of scientific research and innovation, we offer world-leading solutions for transforming renewable resources

into fuels and chemicals for a sustainable world, and for efficient and low-carbon fuel production and clean air.

We were founded in 1940 and are headquartered in Denmark, with over 2,800 employees serving customers all around the globe.

To learn more, visit www.topsoe.com.

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