

Code of Conduct

1. Introduction

Our company guides its business actions and decisions by the generally applicable ethical values, in particular integrity, credibility and the respect for human dignity. It shall support, in an appropriate manner, transparency, responsible management and control within our organisation.

Integrity

The Code of Conduct sets out binding rules that must be observed by all our employees.

Credibility and Transparency

In particularly, the members of the Executive Board and all managers have the responsibility for the active enforcement of this Code of Conduct.

They must act as role models in every respect.

The Code is the framework and guideline for dealing with ethical and legal challenges in daily work. All employees may approach their supervisor, the Compliance Officer or the Managing Directors with questions and comments in this respect.

The company expects that its suppliers respect the guiding values of the Code of Conduct, supports them to the best of its ability and encourages them to do the same in their supply chains.

Scope of Application

The company obeys the laws and regulations of the countries in which it operates.

Supplier Chain

This also explicitly applies to the requirements of national, European and international chemicals law as well as to embargo, customs and export control regulations.

Compliance with Laws

2. Behaviour towards competitors, Business partners and third parties

The company respects the rules of fair and honest competition and does not enter into any agreements that influence competition in an unlawful manner.

Competition and Antitrust Law

Employees of the company are obliged to respect the rules of fair competition. Specifically prohibited is any collusion, but also any coordinated practice with competitors on the



following topics:

- Prices and price components
- Conditions

- Customers
- Delivery areas
- Quotas and capacities
- Agreed market exits
- Agreement on planned innovations
- Boycotts

If the placing of a contract is based on a formal invitation to tender, the company will neither discuss nor match quotes with other bidders.

This applies to both public and restricted tender bidding, irrespective of whether it is a public or private procurement procedure.

Tender Procedures

The company expressly opposes any form of corruption at both national and international level and avoids even the appearance of trying to influence business decisions through unfair business practices.

Employees are not permitted to misuse the company's business relationships for their own or third-party advantage or to the disadvantage of the company.

Employees are not permitted to misuse the company's business relationships for their own or third-party advantage or to the disadvantage of the company.

This specifically means that employees must not grant or accept any unauthorised private advantages (e.g. money, commodities, services) in business transactions that are likely to influence an appropriate decision.

All employees of the company are obliged, in the case of any suspicion or legal doubt concerning the existence of corruption or white-collar crime, to seek advice or assistance. Advice and assistance can be obtained from the Compliance Officer and/or the managing directors.

Invitations, such as to business dinners or events, that are in accordance with accepted business practices and are appropriate may be extended or accepted if they do not serve the purpose of undue inadmissible preferential treatment. The same applies to the acceptance or being offered gifts. If there is any doubt as to the existence of an objective reason or the customary nature of a benefit, the Compliance Officer or a managing director should be consulted beforehand. This point is regulated thoroughly and adequately in-house.

Corruption



Advantages of any kind to civil servants and other public officials as well as to agents of state institutions, even indirectly via third parties, are prohibited, regardless of their value.

Granting and Acceptance of Advantages, Invitations and Presents

In the case of donations to parties and political organisations as well as to elected representatives and candidates for political offices the applicable laws shall be respected.. The appointment of consultants, agents and other intermediaries must not be used to circumvent the ban on bribery.

Office Holders

Donations shall only be made on a voluntary basis and without expectation of any counter-performance. Donations and sponsorships must not be designed to covertly promote decisions in the interests of the company..

Advisors and Agents

The donation must be transparent. The recipient of the donation and the specific use made of it by the recipient must be known.

Donations and Sponsoring

It is essential that the reason for the donation and the intended use can be explained at any time. Donation-like remunerations are to be refrained from. Donation-like remunerations are benefits which only appear to be granted as remuneration for a service, but whose value clearly exceeds the value of the service..

The company does not tolerate money laundering. All employees are required to strictly comply with anti-money laundering laws.. They must also immediately report any suspicious forms of payment or other transactions that may indicate money laundering to the Compliance Officer or a Managing Director.

Money Laundering

The company prepares tax returns and declarations truthfully. All dutiable goods through customs by the company. The company consistently fulfils the legal requirements for export control and customs in the areas of foreign trade and customs law and ensures their proper implementation.

Tax Law / Customs Law / are properly cleared Foreign Trade Law

The company expects its suppliers to qualified and timely provision of export control and foreign trade data, as well as the implementation of sufficient supply chain security standards within the framework of global customs security programmes.

3. Avoidance of Conflicts of Interest

The company expects loyalty from all its employees and takes care to ensure that they do not get into situations in which their private or financial interests

Employee Loyalty



interfere with those of the company or its business partners.

Employees of the company shall immediately disclose any personal interest that may be associated with their work to their superiors.

Employees of the company are strictly prohibited from managing a company or working for a company that competes with their employer.

Additional Employment and Participations

This also applies to the participation of a close relative or spouse.

4. Handling of Information

The employees of the company are obliged to keep company and business secrets and other internal matters confidential.

Company and Business Secrets

This applies accordingly to non-publicly accessible information about contractual partners and customers.

The non-disclosure obligation shall continue to apply after termination of the employment relationship..

In addition to the general confidentiality regulations (z. B. § 17 UWG) the data secrecy according to DS-GVO must be respected.

Data Protection

In particular, it is prohibited to process protected personal data without authorisation for a purpose other than that which is part of the respective rightful performance of the task. This obligation with regard to data protection continues after leaving the company.

All reports and other written documentation shall be accurate and truthful. This applies irrespective of whether they are in-house reports or whether they are shared with the public.

Truthfulness

Data recording and other documentation shall be in accordance with the principles of proper accounting and shall always be complete and correct.

5. Principles of social and environmental responsibility

Social commitment is an indispensable part of value-based corporate governance and is an essential factor for sustainable corporate success.

Social Responsibility



The company respects and supports internationally recognised human rights.

Human Rights

In this context, we are in continuous dialogue with our suppliers in order to avoid our products containing raw materials from conflict regions..

The bans on child labour and forced labour in any possible way are adhered to.

Child Labour

Discrimination against employees and third parties is not tolerated:

Prohibition of any Discrimination

The company strongly opposes inappropriate treatment of employees, in particular harassment of a sexual or verbal nature.

The company is encouraging equal opportunities for all its employees.

Equal Opportunities

Employees' freedom of association and assembly is recognised to the extent that national regulations legally permit.

Employee Rights

The company respects the applicable national laws and labour standards with a view to fair wages and and maximum working hours.

This explicitly includes compliance with all provisions of the legislation regulating a general minimum wage in Germany.

Occupational safety and health protection at work is ensured within the framework of national regulations.

Safety and Health Protection at Work

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for us. -

Environment and Climate Protection

Both in the development of new products and services and in the operation of production facilities, we take care to ensure that any resulting impact on the environment and climate is kept as low as possible and that our products make a positive contribution to environmental and climate protection for our customers.

All employees bear responsibility to treat natural with care and to contribute to the protection of the environment and climate by their individual behaviour.

As far as consumer interests are concerned, the company complies with the regulations for the protection of consumers.

Consumer Interests



The company contributes to the social and economic development of the country and region in which it operates.

Social Commitment

6. In compliance with the Code of Conduct

The company shall familiarise its employees with the content regulated in this Code of Conduct and explain the obligations arising from it.

Communication

The company communicates the principles of the Code of Conduct to its business partners.

The guidelines and requirements set out in this Code of Conduct are mandatory for the company's employees and will become part of their employment contract.

Guidelines and Processes

The company shall take all necessary steps to implement the core values and requirements contained in this Code of Conduct through appropriate administrative measures and suitable policies and processes in all business areas.

The company is committed to monitoring compliance with the Code on a regular basis.

Periodical Inspections

All employees of the company are required to immediately report observed (potential also threatened) violations of laws, internal regulations and this Code of Conduct to the Compliance Officer or a Managing Director.

Notification of Violations

Notifications of a violation of this Code shall be treated confidentially and will not have any negative consequences for the employee making the report, unless an untrue statement of fact has been deliberately alleged.

Consequences of Infringements

Any violations of the Code of Conduct and legal provisions may, depending on their severity, result in consequences under both labour and liability law and may also lead to legal sanctions under criminal law.

Neuss, November 2022

