

DECLARATION OF CONFORMITY ACCORDING TO SECTION 161 AKTG

All recommendations of the Government Commission “German Corporate Governance Code” as amended by the Federal Ministry of Justice in the Official Part of the Federal Gazette on February 7, 2017 (DCGK) have been complied with by AlzChem Group AG (“Company”) since its last Declaration of Conformity in March 2019, with the two exceptions outlined below. The Company intends to continue complying with these recommendations in the future in the same way.

Deductible with D&O insurance for Supervisory Board members (Sec. 3.8 para. 3 DCGK)

The D&O insurance taken out by the Company does not provide for a deductible for Supervisory Board members. Other than for Management Board members such a deductible is not required by law for Supervisory Board members. In view of the role of the Supervisory Board, which is also reflected in the different remuneration structure of the Management Board, this distinction appears appropriate in the treatment of the Management Board and the Supervisory Board. Neither the Management Board nor the Supervisory Board considers a deductible to be an effective way to increase the motivation and sense of responsibility of Supervisory Board members.

Defining the desired level of pension benefits in support of Management Board members (Sec. 4.2.3 para. 3 DCGK)

The DCGK recommends that the Supervisory Board should determine the desired pension level for pension commitments in support of Management Board members, based also on the duration of their term of office, taking into account the annual and long-term expenses this causes for the Company. The Supervisory Board has not defined such a pension level. Instead, each member of the Management Board is entitled to a contribution-based pension scheme, the amount of which is determined as a percentage of the annual basic salary and, if applicable, a portion of the variable remuneration of each individual Management Board member. This gives the Supervisory Board a clear idea of the annual and long-term expenses for the Company, which also depend on actuarial effects due to the formation of reserves. It is increasingly common not to define an intended pension practice, but to use a contributory and performance-based system.

Trostberg, December 2019

AlzChem Group AG

For the Supervisory Board

[Markus Zöllner]

The Management Board

[Andreas Niedermaier]

[Klaus Englmaier]

[Ulli Seibel]

[Dr. Georg Weichselbaumer]