

DECLARATION OF CONFORMITY (SECTION 161 AKTG)

The Management Board and the Supervisory Board of AlzChem Group AG (“Company”) declare pursuant to section 161 AktG:

1. The last Declaration of Conformity of the Company was made in December 2019.

Since this day the Company complied with all recommendations of the “Government Commission German Corporate Governance Code” as amended by the Federal Ministry of Justice and Consumer Protection in the Official Part of the Federal Gazette on February 7, 2017 (“DCGK 2017”), with the exceptions outlined below:

Deductible with D&O insurance for Supervisory Board members (Sec. 3.8 para. 3 DCGK 2017)

The D&O insurance taken out by the Company does not provide for a deductible for Supervisory Board members; specifically, there is no deductible of at least 10 per cent of the damage, up to at least one and a half times the fixed annual income. Such a deductible is not required by law for Supervisory Board members; rather, the Supervisory Board members are exempt from mandatory deductibles. In view of the role of the Supervisory Board, which is also reflected in the different remuneration structure as compared to that 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 the sense of responsibility of Supervisory Board members.

Defining the desired level of pension benefits in support of Management Board members (Sec. 4.2.3 DCGK 2017)

The DCGK 2017 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.

2. On December 16, 2019 the “Government Commission German Corporate Governance Code” presented a new version of the German Corporate Governance Code, which came into force by its publication by the Federal Ministry of Justice

and Consumer Protection in the Official Part of the Federal Gazette on March 20, 2020 (“DCGK 2020”). Since this day the Company has complied with all recommendations of the DCGK 2020 and intends to continue complying with these recommendations in the future in the same way.

Trostberg, December 2020

AlzChem Group AG

For the Supervisory Board

[Markus Zöllner]

The Management Board

[Andreas Niedermaier]

[Klaus Englmaier]

[Dr. Georg Weichselbaumer]