

## Overview: Alzchem Code of Conduct for Suppliers

Preamble	1. <b>Preamble:</b> The Alzchem group (hereinafter "Alzchem") is a globally active chemical group organized under the umbrella of Alzchem Group AG headquartered in Trostberg, Bavaria, Germany. Alzchem supports Chemie <sup>3</sup> , the Sustainability Initiative of the German Chemical Industry, and is actively committed to the progress of a sustainable chemical industry. Alzchem requires its suppliers and service providers (in the following "Business Partner" or "business partners") to comply with the principles set out in this Code of Conduct for Suppliers.
Responsible Business Practices	<ol style="list-style-type: none"> <li><b>1. Compliance with Laws, Recognized Standards and Guidelines:</b> Alzchem requires Business Partner to uphold all respectively applicable national laws and internationally recognized norms, directives and principles.</li> <li><b>2. Prevention of Corruption:</b> Alzchem requires Business Partner to uphold all respective anticorruption laws.</li> <li><b>3. Antitrust- and Competition Law:</b> All applicable national and international antitrust laws and laws against unfair competition must be complied with.</li> <li><b>4. Confidentiality and Data Protection:</b> Business Partner hereby commits to upholding the applicable data protection regulations.</li> <li><b>5. Export and Import:</b> Business Partner hereby commits to upholding all applicable laws governing importation and exportation.</li> </ol>
Working Standards	<ol style="list-style-type: none"> <li><b>6. Occupational Health and Safety:</b> Business Partner hereby commits to ensuring a safe, healthy and hygienic working environment, and to taking all required measures to prevent working accidents and health impacts.</li> <li><b>7. Worktime:</b> Business Partner hereby commits to ensuring its worktimes comply with respective national laws, industrial sector standards, or the relevant International Labour Organization (ILO) conventions, whichever are stricter in their protection of employees' time off work.</li> <li><b>8. Wages and Social Benefits:</b> Business Partner hereby guarantees that the wages it pays its employees secure the livelihood of the employees and at least meet the applicable national legal minimum wage, or the minimum wage established for the sector, and that it guarantees its employees their corresponding social benefits.</li> <li><b>9. Training and Qualification:</b> Business Partner hereby commits to actively promoting and developing its employees' professional skills on all levels by means of suitable training and further education measures.</li> <li><b>10. Complaints Mechanisms:</b> Business Partner hereby commits to implementing and maintaining whistleblowing and complaints mechanisms for its employees.</li> </ol>
People & Fundamental Rights	<ol style="list-style-type: none"> <li><b>11. Human Rights:</b> Business Partner hereby commits to upholding, supporting and monitoring compliance with human rights.</li> <li><b>12. Approach to Child Labor:</b> Business Partner shall not tolerate the exploitation of children or adolescents in any form.</li> <li><b>13. Approach to Forced Labor:</b> Business Partner shall ban all forms of forced and/or compulsory labor.</li> <li><b>14. Freedom of Association and Collective Bargaining Rights:</b> Business Partner hereby commits to upholding the rights of all employees to the freedom of association and collective bargaining, and to protecting these from any infringement.</li> <li><b>15. Disciplinary Measures and Approach to Employees:</b> Business Partner hereby commits to treating all employees with dignity and respect. Sanctions, fines, other punishments or disciplinary measures may only be imposed under strict observation of applicable national and international laws and norms, as well as human rights.</li> <li><b>16. Approach to Discrimination:</b> Business Partner hereby commits to eliminating all forms of discrimination in its workforce. Alzchem requires Business Partner to make equal opportunities and equal treatment material and integral elements of its formal company policy.</li> </ol>
Environmental Protection	<ol style="list-style-type: none"> <li><b>17. Environmental and Climate Protection:</b> Alzchem requires Business Partner to uphold the principles of environmental and climate protection, in accordance with applicable legal requirements and international standards.</li> <li><b>18. Waste and Emissions:</b> Alzchem requires Business Partner to maintain procedures and systems that guarantee the safe and secure handling, transportation, storage, recycling, reuse and management of raw materials, other business materials, and waste.</li> <li><b>19. Process Safety and Security:</b> Alzchem requires Business Partner to implement and maintain safety and security processes to steer and maintain the integrity of its business processes, in accordance with applicable safety and security standards.</li> </ol>
Product Responsibility	<ol style="list-style-type: none"> <li><b>20. Product Safety and Responsibility:</b> Business Partner hereby commits to upholding all laws and applicable legal directives that govern its business activities. Corresponding information must be made available to Alzchem upon request.</li> <li><b>21. Conflict Minerals:</b> Business Partner shall not supply any products or materials to Alzchem that contain metallic elements whose ores and/or derivatives originate from a conflict region.</li> </ol>

Implementation and  
Requirements

- i. **Implementation, Disclosure:** The aforementioned principles must be complied with unless the business partner has its own equivalent code of conduct in place. The regulations in this Code of Conduct are to be made freely accessible to all employees. Alzchem expects its Business Partner to do its best that the requirements of this Code are also fulfilled in Business Partner's supply chain.
- ii. **Monitoring:** Alzchem reserves the right to check Business Partner's compliance with all the above mentioned requirements.
- iii. **Sanctions and Corrective Measures:** Alzchem will consider every serious infringement or violation of the obligations and requirements set out in this Code of Conduct to be a material contractual infringement by Business Partner, and as such will consider taking appropriate legal steps on case-by-case basis.

## Code of Conduct for Suppliers

### Preamble

#### I. Preamble

The Alzchem group (hereinafter "Alzchem") is a globally active chemical group organized under the umbrella of Alzchem Group AG headquartered in Trostberg, Bavaria, Germany. Alzchem supports the Sustainability Initiative of the German Chemical Industry (Chemie<sup>3</sup>).

Alzchem recognizes its responsibility within its own organization, towards clients, customers and suppliers as well as towards the climate and society. In particular, our activities are oriented by the values of integrity and fairness, irrespective of whether its activities take place within or outside Germany. We are explicitly committed to the continual improvement of our performance in the areas of occupational health, safety, climate protection and product responsibility.

This Code of Conduct defines our requirements regarding general business principles and fair competition, working and social standards, climate protection and product safety, full compliance with which Alzchem equally requires of its suppliers and service providers.

The Code of Conduct applies to all suppliers and service providers with whom Alzchem has a direct business relationship ("Business Partner" or "Business Partners" in the following).

### Responsible Business Practices

#### 1. Compliance with Laws, Recognized Standards and Guidelines

Business Partner hereby commits to upholding all respectively applicable national laws in all its business actions and decisions, and also to upholding the internationally recognized norms, directives and principles, in particular the Principles of United Nations Global Compact, the General Declaration of Human Rights, the Conventions of the United Nations Organization, the core labor standards of the International Labour Organization (ILO), and the OECD Guidelines for Multinational Enterprises. Furthermore, Alzchem requires Business Partner to ensure it upholds its own company-internal guidelines and self-commitments. Compliance with this Code of Conduct as well as currently applicable norms and standards shall not be voided by side-agreements such as divergent contractual agreements or any other comparable measures.

#### 2. Prevention of Corruption

Business Partner hereby commits to upholding international and local anticorruption laws and standards. Business Partner shall not, whether in Germany or abroad, influence its own business partners in a sanctionable manner, for instance through offering, requesting or exchanging gifts, inducements (financial or otherwise), remunerations, benefits or compensations. He will also not try to influence his business partners accordingly.

#### 3. Antitrust and Competition Law

Business Partner hereby commits to upholding the national and international antitrust laws, as well as laws against unfair competition. Price or condition agreements with competitors are therefore also forbidden, or any other forms of competition-inhibitive agreements, in particular agreements with competitors with the covert objective of market-sharing or customer allocation.

#### 4. Confidentiality and Data Protection

Business Partner hereby commits to upholding the stipulations of applicable data protection and data privacy laws. Personal data may thus only be gathered, processed or used insofar as it is essential for pre-established and legally permitted purposes. The use of such data must be transparent to the data subject (the person to whom the data refer); Business Partner commits to upholding all laws governing

the notification and reporting of personal data as well as the withdrawal of consent to personal data usage, blocking and deletion.

## 5. Export and Import

Business Partner hereby commits to upholding currently applicable laws governing import and export, and in particular to abide by official sanctions, embargos and other relevant laws, regulations, state and national directives and policies governing the transfer, provision or delivery of goods and/or technology.

## Working Standards

### 6. Occupational Health and Safety

A core business goal of Alchem is to prevent accidents in the workplace as well as work-related illnesses. Our constant objective is to ensure employees' wellbeing and satisfaction, which at the same time contributes to the success of our business.

We therefore require Business Partner to also ensure a safe, healthy and hygienic working environment for its employees, and to take the necessary measures to prevent all forms of work-related accidents and health impacts. Within this effort, Business Partner commits to complying with internationally recognized occupational safety standards. Furthermore, Business Partner undertakes to drive the continual improvement of its working environment and to prioritize safety-related employee training.

### 7. Worktime

The worktime structures implemented by Business Partner shall comply with the respectively applicable national laws, industrial sector standards and relevant ILO conventions.

### 8. Wages and Social Benefits

Business Partner hereby guarantees that the wages it pays to its employees secure the livelihood of the employees and at least meet the minimum legal wage as well as the minimum wage established for the industrial sector. Furthermore, Business Partner shall provide its employees with social benefits that correspond to the respectively applicable national or local standards.

### 9. Training and Qualification

Business Partner hereby commits to promoting and developing its employees' skills by means of suitable training and further education measures.

### 10. Complaints Mechanisms

Company requires Business Partner to set up and maintain anonymous whistleblowing channels for employees that enable them to report possible illegal business practices.

## People and Fundamental Rights

### 11. Human Rights

Business Partner hereby commits to upholding and supporting full compliance with human rights (see: United Nations Universal Declaration of Human Rights).

### 12. Approach to Child Labor

The exploitation of children and adolescents cannot be tolerated in any form. Business Partner hereby commits to upholding the Principles of the United Nations regarding human and children's rights, and in particular commits to upholding ILO Convention 138 on the Minimum Age for Admission to Employment, as well as ILO Convention 182 on the Worst Forms of Child Labour. Wherever national law governing child labor imposes stricter criteria, this law shall take priority.

### 13. Approach to Forced Labor

No form of forced and/or obligatory labor can be tolerated. This means that Business Partner shall not impose any form of involuntary employment, or employment that involves the threat of punishment or other sanctions, including obligatory overtime, indentures, forced labor by prisoners, slavery or bonded labor. Furthermore, Business Partner hereby commits to taking action to eliminate forced and obligatory labor.

#### **14. Freedom of Association and Collective Bargaining Rights**

Business Partner hereby commits to upholding its employees' fundamental right to freedom of association, and their right to collective bargaining (negotiation) within the established framework of national laws, and to ensuring that these rights are not infringed.

In cases where national laws limit the right to freedom of association and/or the right to collective bargaining, Business Partner shall make every effort to ensure that the free and independent association of employees for the purpose of collective bargaining is possible and is actively granted.

#### **15. Disciplinary Measures and Approach to Employees**

The Business Partner has to treat its employees with dignity and respect. Sanctions, fines, other punishments or disciplinary measures may only be imposed under strict observation of applicable national and international laws and norms, as well as internationally recognized human rights. Business Partner hereby commits to ensuring that no employee is subjected to verbal, psychological, sexual and/or physical violence, coercion or harassment.

#### **16. Approach to Discrimination**

Alzchem requires all its business partners and suppliers to integrate the equal treatment of all employees as a core principle within their company policy. Business Partner therefore commits to eliminating and preventing all forms of discrimination on the basis of (but not limited to) ethnic, national or social origin, skin color, gender, age, religion, world view, political orientation and/or activity, membership of a trade union or employee representative body, handicap, sexual orientation or other personal characteristic or preference. Business Partner additionally undertakes to guarantee equal employment opportunities.

### **Climate Protection**

#### **17. Environmental and Climate Protection**

The protection of people and environment is an integral part of Alzchem policy. Alzchem therefore requires Business Partner to mitigate and minimize its environmental impact, observe and continuously improve environmental and climate protection with regard to applicable international standards and legal requirements. This includes avoiding emissions and waste wherever possible, as well as taking steps to raise resource efficiency continually. In order to ensure the protection of the environment and the climate, suitable and demonstrable measures are to be taken and formal management systems (e.g. in accordance with ISO 14001) are to be operated. Alzchem requires Business Partner to ensure the safe, environmentally sustainable development and manufacture of its products, as well as appropriate packaging and transport. Alzchem selects and evaluates its business partners based on environmental, safety and security performance aspects. The success of the collaboration between Alzchem and Business Partner is based on mutual trust, transparency reliability and fairness.

#### **18. Waste and Emissions**

Alzchem requires Business Partner to maintain procedures and systems that guarantee the safe and secure handling, transportation, storage, recycling, reuse and management of raw materials, other business materials, and waste. Business Partner hereby commits to minimizing the generation and disposal of waste, as well as every form of release or emission of materials into the air, water and/or soil that could have negative impacts on human health, ecosystems and/or the climate. Further, Business Partner undertakes to handle, manage and treat all business materials and waste in an appropriate way before these are released into the environment, should this be unavoidable. Business Partner is required to prevent, or if unavoidable to minimize, the unintentional release, emission and/or leakage of hazardous substances into the environment by implementing and actively maintaining the corresponding procedures and systems. Further, Alzchem requires Business Partner to implement and maintain procedures and systems that continually and sustainably optimize its consumption of all relevant resources such as energy, water and raw materials.

#### **19. Process Safety and Security**

Alzchem requires Business Partner to implement and maintain a formal management system to steer its business processes in accordance with recognized safety and security standards. Where appropriate, Business Partner shall carry out site and/or plant-specific risk analyses. Business Partner hereby commits to taking all reasonable measures to prevent incidents at all its sites and plants, for instance (but not limited to) chemical emissions and/or explosions.

## Product Responsibility

### 20. Product Safety

Business Partner hereby commits to upholding all corresponding country and state-specific laws and legal requirements. Additionally, Business Partner undertakes to provide Alzchem with all relevant product information, in particular on the composition, use (including but not limited to processing instructions, installation instructions, as well as occupational health and safety measures) and if required on the disposal of its products, in good time before product delivery or service provision. Furthermore, Business Partner undertakes to provide Alzchem with complete documentation of legal compliance of the products and services it provides, through (but not limited to) Material Safety Data Sheets and product labeling regulations. Business Partner shall include relevant information provided by Alzchem in the corresponding documentation.

### 21. Conflict Minerals

Business Partner hereby commits to ensure that it supplies no products to Alzchem that contain metallic elements whose ores and/or derivatives originate from a conflict- or high-risk region, where they may directly or indirectly contribute to financing or supporting armed groups. The relevant laws and regulations for the fulfillment of due diligence obligations in the supply chain apply.

## Implementation of Standards and Requirements

### i. Implementation, Disclosure

The Business Partner undertakes to comply with this Code and the aforementioned requirements. If the Business Partner has its own Code of Conduct in place, that is equivalent to this Code, the provisions of the Business Partner's own Code of Conduct must be complied with. Business Partner hereby commits to actively informing its own employees of the requirements of this Code of Conduct, in order to guarantee their compliance with the requirements and stipulations this Code contains. In addition, Alzchem expects its Business Partner to do its best that the requirements of this Code are also fulfilled in Business Partner's supply chain. Alzchem explicitly recommends Business Partner to strive for continual improvement in all the areas detailed above with the aid of appropriate formal management systems (that include the definition and documentation of responsibilities, procedures, targets and measures). Further, Business Partner hereby undertakes to cease and desist from all infringements or violations of the stipulations of this Code and to comprehensively examine potential improvement measures derived from such cases.

### ii. Monitoring

Alzchem reserves the right to monitor and check its business partners' compliance with the requirements of this Code set forth in (i) above, either through Alzchem's own employees, independent third parties, certifications or other forms of official assurance, or by means of topic-specific on-site audits.

### iii. Sanctions and Corrective Measures

Alzchem will treat every material violation by Business Partner of the obligations, requirements and stipulations of this Code of Conduct as detailed above as a contractual infringement, and as such will consider taking appropriate legal steps on a case-by-case basis.

Where possible, Alzchem will give its business partners the opportunity to carry out corresponding corrective measures.