



VISION

PRINCIPLES

GUIDELINES

Doing business properly.

AlzChem company guidelines



AlzChem company guidelines

Guidelines for the activities of AlzChem and its employees



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OUR VISION



COMMITMENT TO THE „NCN CHAIN“

We say a definite „yes!“ to carbide and to the Production Verbund based on it - the foundation and the strength that underpins all our activities.

GROWTH

We are all about innovation. We strive to create new fields of activity, tap into profitable markets and optimize our value chain - day in, day out.

„We combine our integrated Production Verbund with innovative chemistry to provide customer-focused applications into selected markets.“

CREATING ADDED VALUE FOR OUR CUSTOMERS

We sell solutions, not molecules. We achieve this by working closely with our customers in order to identify early on where they have potentials for improvement, and then combine our energies towards this goal.

FOCUS

We concentrate on several clearly defined target markets where we want to grow and to be the preferred supplier for our customers.



To make our vision a reality
we have established principles of conduct

1

We reinforce mutual trust through reliability, fairness, timely information and open communication, as well as by obtaining and giving feedback.

2

We pursue the objectives of AlzChem through business activity, assuming responsibility through our decisions.

3

We strive for the highest quality, and we have both an opportunity and an obligation to learn from our mistakes.

4

We develop constructive solutions together - and together we put our decisions into practice.

5

We look for responsible and attractive solutions through dialog with our business partners and the public.



01 Objectives and Scope

The guidelines for AlzChem's activities stipulate that each and every employee abides by the rules of conduct. Why does AlzChem need this compliance, and what exactly does „abiding by the rules of conduct“ mean?

The term „compliance“ describes the sum of all the measures that a company and its employees must take to ensure that their actions conform with all the legal obligations and constraints of the law. In addition, the business of the company should be conducted in harmony with all social guidelines and core values.



Compliance Guidelines for AlzChem Employees



Where does the compliance system come into effect?

The compliance system of the AlzChem serves to prevent or limit losses, to uncover infringements and stop them, and to fulfill legal obligations.

These guidelines summarize the most important business policy principles and standards of AlzChem that all employees must be familiar with. They are a guide to the basic legal and ethical obligations of AlzChem's employees, and provide them with certainty about their correct professional conduct. The company guidelines determine our conduct, both internally in how we deal with each other, and externally in our contact with business partners and the public, as well as with public authorities and government offices.

Responsibility creates trust.

All employees are responsible for ensuring compliance, supported through the role models of leadership and management provided by all the line managers. In addition, compliance is a trust-building measure that serves to protect the worldwide image of our Group and its employees. It also promotes a culture of mutual trust, predictability and integrity.

The scope of the company guidelines covers all legal organizational entities of AlzChem Group, as well as all associated companies in which AlzChem Group AG directly or indirectly owns a share of more than 50 %.

The integrity of all actions provides an essential base on which to build a sustainable and successful business.

Conducting business

Complying with all statutory rules and regulations

AlzChem is a company that operates worldwide, and as such it is subject to numerous national and supranational legal provisions (e.g. regulations of the EU), as well as to the legal provisions of other countries. All of AlzChem's business matters and processes must therefore be conducted in accordance with all the applicable laws and other binding regulations within whose jurisdiction AlzChem pursues its business activities.

No instruction to the contrary may be given that leads to a violation of the conduct regulated by these guidelines when pursuing business activities.

Corruption

Any active or passive corruption or acceptance of benefits in accordance with the provisions of Article 299 ff of the German Penal Code, or any attempt to engage in this, is prohibited at AlzChem. Any appearance whatsoever that the employee has been seeking to exercise influence through inappropriate means must be avoided.



Gifts and entertainment and other benefits

Gifts, favors, hospitality, and other benefits may only be offered or accepted provided they do not exceed the bounds of typical business practice in the region concerned, are not of an inappropriately high value, and are within the limits permitted by statutory or labor law. Business meals are generally regarded as appropriate up to the value of 60 euros (see also Travel Guideline). In addition and in cases of doubt, employees should consult their line managers or the Compliance Manager. Upon request of the line manager or Compliance Manager, all employees undertake to disclose gifts, hospitality and other benefits offered or accepted.

Use of assets and resources of the company

The resources of the AlzChem may not be used for private purposes. Exceptions may be allowed by the line manager or through separate regulations (e.g. works agreements).

Integrity of reporting All expense reports, accounting documents, financial, research and sales reports, environmental and safety reports as well as other documents of the Group must provide a correct, clear and timely reflection of the relevant facts and character of a business transaction.

Open dialog / External communication We believe in open dialog – both in the way we interact with our own employees or employee representatives, and with regard to business partners, neighbors and authorities. During official or in-house audits all employees are obliged to cooperate in clarifying matters, and to make available all the information required by the third parties. At AlzChem any official statements, especially those to the media, are made only by persons authorized to do so.

Human rights, labor and social standards As a global company, we are fully committed to upholding human rights, among ourselves and with our suppliers. AlzChem has therefore joined the Code of Conduct of the Federal Association for Materials Management, Purchasing and Logistics (BME) and is certified annually to the BME's specifications.

Business relationships

Equal treatment and fairness We treat all business partners in a legally proper and fair manner. The purchasing organization selects suppliers and service providers using a systematic process based around objective and comprehensible criteria. Wherever possible and practicable, contracts are awarded on the basis of competitive offers. When selecting our suppliers we check that they transact business in accordance with the principles of these company guidelines.

Business incentives Incentives such as performance-based commission, discounts, price reductions and free delivery of goods must be used with a good deal of caution, so as to ensure that the various statutory regulations are complied with. The business incentives must be fully and accurately documented.

Payments Payment for supplies and services received must be made directly to the contractual partner concerned. Payment is normally made in the country where the registered offices of the contractual partner are located. Except in minor instances it is forbidden to use cash for payment, whether in full or in part. We comply with applicable laws in all financial transactions, particularly the regulations to prevent money laundering.

Conflicts of interest

Secondary occupations / Political commitments The private interests of AlzChem employees and the interests of AlzChem are to be kept strictly separate. A conflict of interest occurs if the private interests in any way whatsoever conflict with those of AlzChem, or even if they might give the appearance of doing so.

AlzChem welcomes the social involvement of its employees in working with young people, adult education, in sport and in charitable and cultural areas, including where the employee receives an appropriate compensation /reimbursement for doing so. Secondary occupations of any kind whatsoever must not compromise the obligation of the employee to make his or her full working capacity available to AlzChem. In accordance with the provisions of the contract of employment an employee may require approval if engaging in a secondary occupation, and therefore the line manager or the relevant personnel department should be informed of this activity. In a democratic system, political commitment and active citizenship on the part of a company and its employees is essential for the economy and society to function properly. AlzChem therefore welcomes this commitment on the part of its employees, and encourages it. At the same time, AlzChem respects that its employees have the freedom to make their own political decisions. In particular, employees may in no way, whether directly or indirectly, be prevented from donating to political parties or from supporting a political party or the candidacy of a person for political office. AlzChem employees should notify their line managers or the Compliance Manager of their political mandates.

02 Conduct in the business context

Material interests in competitors, customers and suppliers

The activity of an employee, including that of close family members, which affects essential core elements of AlzChem's business may not compete with AlzChem or conflict with AlzChem's interests, and in cases of doubt the line manager or Compliance Manager is to be notified. Interests, also those of close family members, held in a competitor, customer or supplier are to be notified to the line manager or the Compliance Manager. Close family members are life partners and children of minority age. In the meaning of this regulation, a company interest that requires notification is one where the shareholding is five percent or higher.

Awarding contracts to family members, and doing other business with them

In principle, no business transactions should be conducted with an employee's close family members. In individual cases, however, the transactions may be approved by the Management Board of the AlzChem Group AG. In this case steps should be taken to ensure that the employee concerned has no influence on the decision-making.

Maintaining the confidentiality of internal information

All trade and business secrets are subject to secrecy and must not be disclosed to third parties during the business relationship or after it has ended. This does not include business-related communication with authorities and associations. In these cases the direct line manager is to be notified before the information is passed on. It is forbidden to directly or indirectly utilize confidential business information during and after the termination of the business relationship for personal advantage, for the benefit of a third-party or to the disadvantage of AlzChem. AlzChem employees are obligated to participate in actively securing confidential data from access by a third party, in line with the existing directives.



Donations

Donations are made in the form of monetary grants and benefits in kind to promote cultural, social, religious, scientific, political and non-profit purposes. Donations in the name of AlzChem require the approval of the Management Board. Only the communications department may transact such donations.

Equal treatment and dealing with each other

Employees treat each other fairly and honestly. In particular, when conducting business activities all employees must respect the rights and national and cultural differences of each individual person with whom they come into contact. It is the stated aim of AlzChem not to discriminate against any employee, job applicant or business partner on grounds of race, ethnic origin, gender, religion, beliefs, disability, age or sexual identity. Any form of harassment of employees, or employees of business partners, is prohibited.



03 Special topics

Anti-trust law

It is a fundamental principle of company policy that all of the Group's employees act in accordance with the relevant anti-trust law that applies to AlzChem's business activities. In general, the anti-trust laws prohibit arrangements and actions that could inhibit trade or restrict competition. Infringements of these laws include, for example, talks among competitors aimed at fixing or controlling prices, to boycott certain suppliers or customers, to divide up customers or markets or restrict production or sale of products.

Foreign trade and export control

AlzChem complies with all applicable foreign trade customs regulations.

Environment, safety and health

For AlzChem, the fundamental elements of responsible corporate practice include protecting people from adverse effects on their safety and health from products, business and production processes and treating the environment and natural resources in a responsible manner. Basing its approach on complying with laws and regulations, AlzChem strives constantly to improve its achievements and its management system in these areas. The capabilities of the employees are to be maintained through age-appropriate workplaces and an effective health management for all employees.



Data protection

Handling personal data carefully and conscientiously is one of the core values arising from respect for the privacy of fellow human beings. The right of employees and business partners to informational self-determination must always be protected. The unauthorized collection, processing, forwarding and use of the personal data of employees and business partners are forbidden. All employees have access to a Data Protection Officer to answer all their questions concerning data protection.

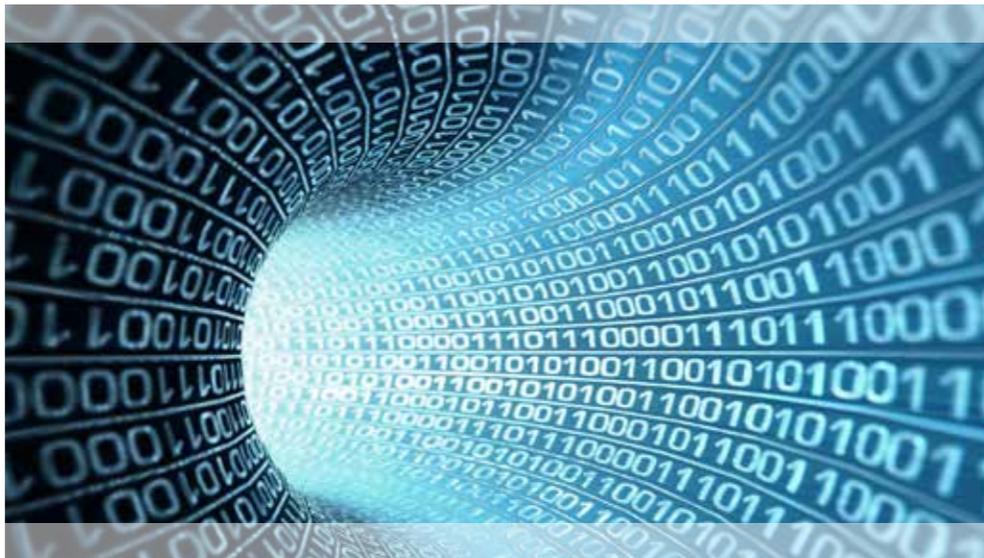
The data privacy policies are described in a guideline in detail.

IT security / information security

Very many of AlzChem's business processes are based on IT systems. In addition, a great deal of information is processed digitally and transferred in networks. Because of the intensive utilization of IT systems the business operations of AlzChem rely heavily on the availability and proper functioning of the systems and the integrity of the processed data. Adding to the risks arising from these is the risk of loss, theft or unnoted alteration of information.

The employees of AlzChem therefore undertake to handle the IT systems they use and the data stored on them in accordance with regulations. Without exception, a virus scan must be performed on all external data storage media.

In addition, AlzChem maintains a certified management system for information security.



Insider Compliance Rules

Insider information/ price-sensitive information

AlzChem Group AG is a quoted company listed in the Prime Standard. We publish communications transparently, promptly and in accordance with capital market regulations. Our employees are subject to special duties. The exploitation and disclosure of insider information, meaning share-relevant information that is not yet known on the market, is prohibited to all employees. Insider offenses can be prosecuted under criminal and civil law and also entail employment-related measures.



04 Implementing the company guidelines

The Management Board of the AlzChem Group AG, the Compliance Manager and all employees are responsible for implementing these company guidelines, unless the responsibility for individual specific topics has been transferred to the head of the particular department.

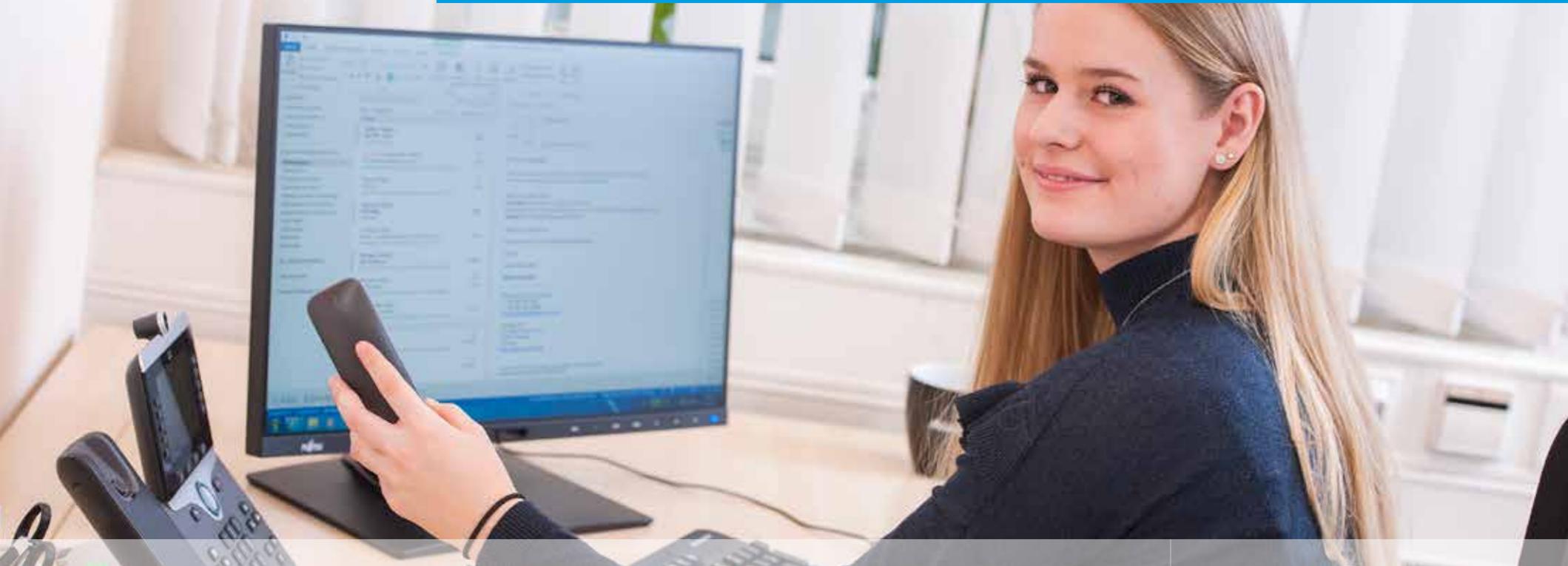


Contact partners

The Compliance Manager will ensure that all matters referred to him or her are dealt with independently and objectively. In this capacity he reports directly to the Management Board, but carries out his work independently and autonomously. All employees have access to the Compliance Manager to speak to, and he is there to answer their questions and also to give advice with regard to the company guidelines. He will make note of all information received and will follow it up with all due care. Information received is treated as strictly confidential to the extent legally possible.

Obligation to inform and control of superiors

If the Compliance Manager establishes that there are sufficient grounds for suspecting that the principles contained in these guidelines may have been infringed, he can, while maintaining the confidentiality of the information received, involve other departments in the AlzChem in establishing the further facts of the matter. The employees of the Compliance Manager are bound to absolute secrecy. Contacting the Compliance Manager will not have any negative implications for the particular employee, unless the employee himself or herself has violated the law or infringed company guidelines.



Anonymity is preserved

identity and provided information as confidentially as legally possible and desired by the employee, including in relation to the AlzChem. Heussen Rechtsanwaltsgesellschaft mbH will investigate the information it receives with due diligence and determine the underlying facts. Heussen Rechtsanwaltsgesellschaft mbH will not pursue any anonymous tips. As employees may appeal to Heussen Rechtsanwaltsgesellschaft mbH without a fee, no disadvantages will result for an employee acting as a whistleblower unless that employee has violated the law or company guidelines.

Whistleblower Hotline

Contact partners

The AlzChem has established a whistleblower hotline with an external reporting office. The independent law firm Heussen Rechtsanwaltsgesellschaft mbH is available to AlzChem employees and third parties such as business partners and customers as an external reporting office. The Compliance Manager also remains an available contact. The lawyers of Heussen Rechtsanwaltsgesellschaft mbH are subject to confidentiality according to the professional law applicable to them. They will treat employee

External contact partners

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04 Implementing the company guidelines

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| Information and control obligation of line managers | All line managers should therefore ensure that their staff are regularly reminded of the contents of these company guidelines and monitor that their staff are complying with its provisions. Line managers undertake to actively support these company guidelines and the principles of conduct they contain through the example set by their own behavior. |
| Employee request for notification of knowledge of deviations | Employees should inform their Compliance Manager, supervisor or alternatively the external reporting office Heussen Rechtsanwalts-gesellschaft mbH with knowledge of violations of legal regulations or this Code of Conduct or justified suspicion cases. |
| Sanctions and consequences | In addition to personal consequences, in particular through legal investigation into violations of the law, infringements of these company guidelines may also result in disciplinary action in accordance with the labor law applicable locally and in line with operational guidelines. |
| Training | Employees will be instructed in more detail about the AlzChem company guidelines through the LeManSys „Richtig handeln“ (Doing business properly) training. This is an obligatory training for employees, and their successful completion of the training will be documented. In addition, special training will be offered for specific groups of people on relevant topics (e.g. export and terrorism controls, anti-trust law and environment, safety and health), and participation in this training may be obligatory. Participation in this training will also be documented. |

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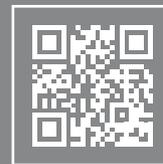
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