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Corporate Compliance Policy

Code of Conduct
of the OQEMA Group for business partners



Preamble

OQEMA AG with the companies of the OQEMA Group (hereinafter jointly referred to as "OQEMA") has developed into one of the leading distribution companies for basic and specialty chemicals in Europe in recent years.

Compliance with strict legality as well as responsible and fair business conduct are top priorities for our company and an integral part of our corporate values.

Sustainability is an important element of our self-image and our corporate strategy.

We are committed to compliance with internationally applicable human rights and social standards in our value chain.

Our business partners make a significant contribution to our success. We see a common understanding of ethical and sustainable behaviour as an essential basis for this. The requirements and principles of this "Code of Conduct for Business Partners" are an essential part of the cooperation between OQEMA and our business partners.

The social and environmental standards and processes described here are based on the ten principles of the United Nations Global Compact, the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

These regulations serve to implement the German "Lieferkettensorgfaltspflichtengesetz" (supply chain due diligence directive) and other comparable national regulations.

The requirements and principles of this Code of Conduct are an essential part of the contractual obligations and cooperation between our business partners and OQEMA. Therefore, our business partners undertake to comply with and promote the following principles of this Code of Conduct and to train their employees regularly and appropriately in this regard. Furthermore, these contents also apply to suppliers and other third parties used by our business partners for the fulfilment of contracts. The business partner must therefore integrate the provisions of this Code of Conduct into its own contracts. We expect them to commit their suppliers and other third parties accordingly.

We are aware that legal and cultural requirements in individual countries, business areas or markets may differ. If stricter regulations apply in individual countries, business areas or markets than those regulated in this Code of Conduct, the stricter regulations shall apply.

This Code of Conduct applies to all business partners of OQEMA. Business partners within the meaning of this Code of Conduct are all third parties who act for, on behalf of or together with OQEMA. This includes in particular, but is not



limited to, suppliers, subcontractors, consultants, brokers, agents, sales representatives, distributors, contractors and freelancers.

As national and international regulations evolve rapidly, we reserve the right to amend this Code of Conduct accordingly, in particular due to changes in relevant laws and regulations. In the event of a change to the Code of Conduct, the business partner will be informed by OQEMA in an appropriate manner.

Principle of legality

OQEMA adheres to the principle of strict legality for all actions, measures, contracts and other processes of OQEMA. Compliance with the principle of legality also includes, among other things, the payment of taxes and customs duties owed, compliance with competition and antitrust law, the prohibition of corruption and money laundering, the obtaining of necessary official approvals, compliance with export control law and the observance of legal rights of third parties. This also applies to the development and manufacture of products and the provision of services.

Accordingly, we expect our business partners to comply with the applicable laws, the basic principles of the United Nations Global Compact as well as this Code of Conduct in the context of their business activities with OQEMA and to work towards compliance with this Code of Conduct by third parties used to fulfil contracts with OQEMA.

Dealing with employees

Our business partners comply with the basic labour rights on the basis of the respective applicable national legislation. The following principles are based on the fundamental principles of the International Labour Organisation (ILO).

Human rights

Our business partners uphold internationally recognised human rights and actively promote their observance. The United Nations Guiding Principles on Business and Human Rights form the basis for this.

Child labour

Our business partners only employ people who have reached the minimum age required to perform work in accordance with the applicable national legislation. They also respect and observe the rights of children. The ILO Conventions No. 138 on the Minimum Age for Employment and No. 182 on the Elimination of the Worst Forms of Child Labour must be observed.

Forced labour

Our business partners reject all forms of forced labour, including human trafficking, torture and any form of slavery or compulsory labour, and respect the principle of freely chosen employment.



Freedom of association

Our business partners respect the freedom of association and the right to form interest groups. They grant their workers the right to defend their interests on the basis of national legislation. Within the framework of legal regulations and in accordance with ILO Convention No. 98, the right to collective bargaining for the regulation of working conditions and the right to strike shall be granted.

Equal opportunities

Our business partners do not tolerate any discrimination of employees on the basis of skin colour, ethnic origin, gender, age, nationality, social origin, disability and sexual orientation as well as religious affiliation or ideology. The same applies to any form of harassment. In the case of comparable requirements and tasks, the principle of equal pay for work of equal value must apply regardless of the difference in gender. The ILO conventions must be observed.

Fair working conditions

Our business partners undertake to guarantee the right to fair working conditions in accordance with the applicable ILO conventions. Our business partners shall pay remuneration and social benefits that at least comply with national and local legal standards, regulations or agreements. The applicable regulations on working hours and holidays are observed.

Occupational health and safety

Our business partners shall, as a minimum, comply with applicable national standards for a safe and hygienic working environment and shall take appropriate measures to ensure health and safety in the workplace in order to ensure healthy working conditions. Our business partners also review the introduction and further development of an occupational health and safety management system (OH&S management system) analogous to ISO 45001 or an OH&S management system suitable for the industry and, in this context, introduce measures to implement the objective of an OH&S management system in an appropriate manner.

Protection against eviction and land seizure

Our business partners commit not to carry out unlawful evictions. Furthermore, they commit not to unlawfully deprive land, forests and water bodies through acquisition, development or other use.

Use of private or public security forces

Our business partners undertake to refrain from hiring or using private or public security forces if, due to a lack of instruction or control on the part of the company, there is a risk of torture and cruel, inhuman or degrading treatment, injury to life or limb, or interference with the freedom of association and union.



Environmental protection

Our business partners avoid hazards to people and the environment, keep environmental impacts to a minimum and use resources sparingly.

Our business partners' processes, operating sites, and resources comply with the applicable legal requirements and standards for fire and environmental protection. Additionally, we value the introduction and development of an environmental management system (EMS) analogous to ISO 14001 or a system suitable for the industry. We place great importance on our business partners taking appropriate measures to meet the objectives of ISO 14001.

Climate protection

We expect our business partners to engage in sustainable and active climate protection, for example by increasing energy efficiency or generating or purchasing energy from renewable sources.

Water consumption and quality

Our business partners are committed to using water carefully. Particularly in areas of water scarcity, water withdrawal must be minimised and access to drinking water and sanitary facilities must be provided. Wastewater quality standards are to be defined and monitored within the framework of and in accordance with applicable legal and regulatory requirements.

Air quality and soil quality

Our business partners comply at a minimum with the relevant legal requirements and the requirements of the local authorities.

Materials and disposal

We expect our business partners to minimise any impact of their business activities on the environment and to use resources sparingly. Wherever possible, materials are reused. When dealing with waste, our business partners follow the principle of "avoidance before disposal". Our business partners always comply at least with the relevant legal regulations and official requirements.

Business relations

Avoiding conflicts of interest

Our business partners make decisions on the basis of factual considerations and are not unduly guided by personal interests. If our business partners become aware of a potential conflict of interest in connection with our company, they will inform OQEMA immediately.

Free Competition

Our business partners behave fairly in competition and comply with the applicable legal regulations that protect free competition. In addition, they do not enter into any agreements or concerted practices with other companies that have the purpose or effect of preventing, restricting or distorting competition in accordance with the applicable antitrust laws and do not illegally exploit any dominant market position.



Corruption

Our business partners ensure compliance with applicable anti-corruption laws. In particular, they shall ensure that their employees, subcontractors or agents do not offer, promise or grant advantages to OQEMA employees with the aim of obtaining a contract or other preferential treatment in business dealings. These principles also apply if our business partners cooperate with other third parties in connection with their work for OQEMA.

Under no circumstances will our business partners tolerate payments or other benefits to an individual, a company or a public official with the aim of influencing the decision-making processes of the beneficiary or a third party, regardless of whether or not this violates applicable laws and regulations. Our business partners only make donations in connection with advertising measures, donations and sponsoring within the legally permissible and customary framework.

Likewise, our business partners never offer, grant, demand or accept illegal payments, such as bribes, kickback payments or other benefits for the realisation of business or in connection with the business relationship.

Trade secrets

In working with our customers and business partners, we often gain insight into confidential know-how, ideas, concepts and plans. The trust associated with this is an essential business basis for OQEMA. The same applies to OQEMA's own internal information, such as new product developments, business ideas or business documents. The confidential handling of information is therefore of essential importance to us, which is why we also demand such confidentiality from our business partners.

Our business partners ensure that confidential information is kept secret by OQEMA and that intellectual property is protected. This also applies after the termination of the business relationship.

Furthermore, our business partners comply with all applicable data protection laws and use third party software (including open source software and firmware) only within the scope of rights granted and in compliance with the relevant licence terms.

Money laundering

Our business partners comply with the relevant legal provisions for the prevention of money laundering.

Customs and export control regulations, sanctions

Our business partners comply with international customs and export control regulations and ensure the proactive exchange of information relevant to foreign trade with the aim of a secure supply chain.

Our business partners comply with the regulations on sanctions and embargoes applicable to OQEMA as well as to the business partner, as well as the regulations



concerning the transport of goods, technologies, services and information and the fight against terrorist financing.

Data protection and data security

Our business partners are obliged to ensure the right to informational self-determination, the protection of personal data as well as the security of all business information and personal data in all business processes in compliance with legal requirements and applicable data protection and information security laws.

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IT security

Electronic data processing systems are essential. Tampering with or malfunctioning of these systems can have serious consequences, such as data loss, theft of personal data or copyright infringement. OQEMA has therefore taken appropriate measures and issued rules to ensure the confidentiality, integrity and availability of electronically stored information.

We expect our business partners to also ensure the protection of electronically stored information by taking appropriate security measures. In particular, they take all necessary measures to prevent internal or external misuse and threats to sensitive information.

Whistleblower procedure, complaint procedure

Every business partner - their employees or those affected - is called upon to report possible cases of suspicion and violations of this Code of Conduct. In this way, the consequences of such violations shall be limited and comparable misconduct shall be avoided in the future.

Reports can be submitted via the contact addresses listed in the appendix. Our business partners will inform their employees about these reporting options.

Where required by national rules, our business partners set up their own whistleblowing system or join an industry-wide system.

Financing armed groups

Our business partners work to prevent the direct or indirect financing of armed groups. In this context, they observe the applicable legal requirements regarding "conflict commodities" and comply with them accordingly.

Compliance with this Code of Conduct, controls

Our business partners communicate this Code of Conduct to third parties used to fulfil the contractual relationship with OQEMA, take the Code of Conduct into account when selecting them and work towards compliance with it.

OQEMA reserves the right to verify compliance with this Code of Conduct by our business partners in an appropriate manner. For this purpose, OQEMA will coordinate with the business partner on the scope, time and place accordingly.



Any violation of this Code of Conduct constitutes an impairment of the business relationship between OQEMA and the business partner. The business partner shall inform OQEMA, within a reasonable period of time, which internal measures they have taken to prevent future violations. If the business partner does not comply with these obligations within a reasonable period of time, if the business partner demonstrably does not initiate appropriate improvement measures within a reasonable period of time or if the violation is so serious that a continuation of the business relationship becomes unreasonable for OQEMA, OQEMA reserves the right, without prejudice to further rights, to terminate the contractual relationship concerned without notice or to withdraw from the contract concerned.

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We ask all our business partners to join us in our commitment to act with integrity, fairness and independence in our day-to-day business.

OQEMA AG for the OQEMA Group

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Appendix

Compliance contact

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Whistleblower System of the OQEMA Group

www.oqema-whistleblowing.com