

Code of Conduct of the LEHVOSS Group

1. The LEHVOSS Group

Lehmann&Voss&Co. and its subsidiaries (LEHVOSS Group) offer a broad portfolio of chemical and mineral specialities through the flexible combination of the three procurement channels distribution, trade and production. For our customers, we are a trustworthy partner with high technological solution competence, personal advice and individual services.

As a family business, we think and plan for the long term. Our actions are based on the values described in "[Our Values-Our Guidelines](#)". As a chemical company, we want to increase the value of the company without taking risks that threaten its existence or overlooking social, legal and ecological aspects. Everyone is responsible for ensuring that this is reflected in our daily actions. This makes our actions sustainable.

2. Policy Statement on Sustainability - also within the Supply Chain

As a signatory, we commit to support the [Ten Principles of the UN Global Compact](#) (see Annex) in the area of human rights, labour standards, environmental protection and anti-corruption, and to integrate it with its 10 Principles into our corporate strategy and culture and daily business. We participate in cooperation projects that promote the general goals of the United Nations, in particular the Sustainable Development Goals.

We consider the protection of human rights to be a central element of our corporate responsibility. We base our commitment to respect human rights on the United Nations Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We are committed to respecting internationally recognised human rights, to respecting them in our business activities and along our value chains. This includes in particular the prohibition of child and forced labour, the prohibition of all forms of slavery and discrimination, and the strengthening of freedom of association.

We are also committed to the observance of labour protection, the payment of adequate wages, as well as the prohibition of environmental pollution, forced eviction and the use of security forces if their use entails the risk of disregarding or restricting human rights.

We are committed to the Minamata, POPs and Basel Conventions.

This statement illustrates our fundamental commitment to respecting human rights. The principles set out here apply to our own business activities and to all employees of the LEHVOSS Group.

Furthermore, we also expect our suppliers and other business partners to commit to complying with the principles set out here and to implement appropriate processes to respect human rights. This includes providing information on how they comply with these principles when requested to do so.

We always comply with applicable national law. In cases where international human rights are restricted by local laws, we strive to promote the principles behind the international standards without conflicting with local laws. Where local laws go beyond international standards, we will comply with them.

To live up to our commitment to respect human rights, we work to implement appropriate due diligence processes to identify and mitigate risks or impacts. We will adapt our policy statement accordingly over time.

As a company in the chemical-pharmaceutical sector, we have the opportunity to strengthen the protection of human rights in many ways. However, we are also aware of the potential human rights risks that can accompany our business activities.

We strive to gradually and regularly analyse, document and better understand our risks and their concrete connection to our company through structured risk assessments in our own business activities, the supply chain and related to our products and services. We will have conducted an initial risk analysis by the end of 2023. We will incorporate the results of our risk analyses into relevant business processes, in particular into our supplier management system. Where risks exist, we will implement appropriate preventive measures.

The health and safety of our employees is our top priority. By implementing uniformly high standards at all our sites, for example through the Responsible Care Management System, we are continuously working to create a safe and healthy working environment. Our employees take part in regular training to promote safety-conscious behaviour.

In cases where we cause or contribute to actual human rights violations through our business activities, we are committed to implementing effective remedial action.

A governance structure that allocates responsibilities for the operational implementation of our human rights strategy is currently being established. We will update our policy statement accordingly.

3. Compliance - Trust Through Honest and Compliant Business Conduct - a Personal Challenge and the Result of Joint Efforts

In all our business activities and decisions, we undertake to comply with the applicable laws and other relevant provisions of the countries in which we operate. Business partners are to be treated fairly. Contracts shall be complied with, taking into account changes in the general conditions.

This LEHVOSS Group Code of Conduct clarifies these principles. The aim is to prevent situations that could call into question the probity of our conduct and confidence in our performance.

We can only continue to achieve these goals if all those involved cooperate. Therefore, the Code of Conduct formulates binding requirements for all employees.

All employees must comply with all relevant laws and regulations in their work environment as well as with internal instructions and guidelines.

All employees are required to behave honestly and fairly in their working environment and to avoid any conflict between private and business interests of the LEHVOSS Group or the interests of our customers.

Managers have a role model function. They bear responsibility for their own conduct and the conduct of employees in their area of responsibility as well as for proper compliance with all procedures provided there to avoid reputational and legal risks.

4. Respectful Treatment of Each Other - Prohibition of Discrimination - Development According to Performance and Potential

Our success is also essentially based on respectful interaction with each other. We are willing to learn from mistakes and value the open word. The essential criteria for the development of employees are performance and potential.

The LEHVOSS Group does not tolerate discrimination or harassment of any kind in the work environment, whether based on age, disability, origin, gender, political or trade union views, race, religion or sexual orientation.

5. Protection of Personal Data and Confidential Information-Requests for Information from Public Authorities

We strictly observe the regulations on the protection of personal data.

Confidential information and documents about customers, the LEHVOSS Group or employees must be protected in an appropriate manner from the insight of third parties as well as colleagues who are not involved.

Personal data may only be collected, processed or used to the extent necessary for specified, explicit and legitimate purposes. The use of data must be transparent for the data subjects. Their rights to information and correction and, if applicable, to objection, blocking and deletion must be safeguarded.

In the technical protection against unauthorised access to data and information, an appropriate standard corresponding to the state of the art shall be maintained.

The use, further processing or placing on the market of plagiarised products is not approved.

The LEHVOSS Group cooperates with all competent public bodies and supervisory authorities. Any communication in this regard may only be conducted via the employees appointed for this purpose.

6. Communication Towards Customers, Business Partners and the Public

All statements and reports of the LEHVOSS Group must be complete, honest, accurate, timely and understandable. Be it towards business partners, customers or the public.

This applies in particular to information and advertising material about our products.

Information to business partners, customers or the public about the LEHVOSS Group, our products, our customers or business partners may only be provided by employees authorised to do so.

7. Social Networks

Anyone who speaks out in a public discussion or on social networks on topics that affect the LEHVOSS Group or our business partners should make it clear that they are acting as a private individual and have the interests of the LEHVOSS Group and business partners in mind.

Please take into account that statements in emails or social networks can be made informally and spontaneously, but are then nevertheless recorded and can be viewed for a long time by the recipient or the internet public.

8. No Conflicts of Interest with Clients and Business Partners

The LEHVOSS Group strives for sustainable business relationships with its customers and business partners for mutual benefit.

Every employee must therefore ensure that the interests of our customers are taken into account in a fair manner. Interests of customers or business partners must not be given priority to the detriment of other customers or business partners.

9. Customer Complaints

Customer complaints provide valuable information about opportunities for improvement in our business and, if handled properly, offer an opportunity to strengthen or regain customer relationships.

The LEHVOSS Group takes care to ensure that all significant customer complaints are dealt with promptly in a fair and comprehensible manner.

10. Personal Conflicts of Interest

If employees become involved in conflicts between their personal interests and their professional duties or the interests of the LEHVOSS Group or our customers, this can damage the reputation of these employees and the LEHVOSS Group as a whole.

Employees should therefore avoid such situations in the interest of the LEHVOSS Group as well as in their own interest. The following applies in detail:

- No sideline activities that impair the time scope of the employment contract duties or the competitive interests of the LEHVOSS Group. Secondary activities must be reported in advance to the supervisor and the Human Resources Department. Honorary positions of limited duration do not have to be reported.
- No financial interests in companies that may be affected by professional decisions of the employee or the LEHVOSS Group (exception: listed stock corporations).
- The awarding of contracts to relatives, life partners or other related persons of employees - if known - must be reported in advance to the superior and the Legal Department. This also applies to transactions with companies in which relatives are directly or indirectly involved.
- If possible, no direct reporting lines between children, parents, spouses or civil partners.
- No assumption of positions of entrepreneurial responsibility (e.g. member of a governing body, managing director, board of directors, supervisory board, advisory board) with customers, business partners or competitors without the prior consent of the management after notification to the Legal Department.

In cases of doubt, please consult the Legal Department. The perception of third parties is decisive. Even the appearance of a personal conflict of interest is damaging.

11. Gifts, Business Lunches and Events

Gifts, business meals and events for informational, representational or entertainment purposes may be a legitimate means of establishing and supporting business relationships. However, they must never be used to

gain unfair business advantage and must not be to such an extent or in such a way as to impair the professional independence and judgement of those involved.

By observing the following rules, employees can protect themselves from misunderstandings:

- No objections to hospitality and meal invitations directly related to business to a reasonable extent (maximum of EUR 150 per person as a guideline).
- No objections to give-aways.
- In principle, no objections to gifts with a market value of up to EUR 40 (benchmark)
 - unless in a timely manner prior to the conclusion of contracts or negotiations,
 - to the private address or in any other non-transparent manner.
- Never cash or money substitutes, e.g. cheques, gift vouchers.
- Invitations for representation purposes or with a predominant or partial entertainment part only,
 - after special examination of customary business practice and appropriateness,
 - if representatives of the host are present,
 - participation is not repeated frequently, and
 - the travel and accommodation costs are not covered by the inviting business partner.
- In case of doubt, the Legal Department should be consulted.

Particular caution is required in the case of public officials. Here, the rules for gifts and invitations of the respective authority must be observed.

12. Donations and Sponsorship

The management decides on donations and sponsoring. They may not be used to indirectly obtain unfair advantages from business partners.

13. No Tolerance of Corruption, Special Caution with Public Officials

Our success in the market is based on performance, flexibility and service and must not be cheated by unfair benefits. Our business partners trust in the professional judgement of our employees.

The LEHVOSS Group therefore does not tolerate any form of bribery or venality, acceptance of benefits or granting of advantages.

Those who do not observe the rules on gifts and invitations in Clause 11 run the risk of becoming liable to prosecution for corruption offences. Even the promise or demand of unfair advantages can be punishable.

In the case of invitations and benefits to public officials, their internal rules for gifts and invitations must be observed in any case. The granting of advantages to public officials may be punishable as acceptance or granting of an advantage simply because it is made in view of the official position. It is not necessary that the exercise of office is to be influenced in an unfair manner. Anyone entrusted with the performance of public duties can be a public official, not only civil servants and public employees.

14. Prevention of Money Laundering and Terrorist Financing

The LEHVOSS Group has established risk-appropriate precautionary measures in accordance with the legal provisions and requirements of the regulatory authorities to prevent money laundering and the financing of international terrorism as well as export control. These must be observed at all times.

15. Protection of Competition

The LEHVOSS Group does not participate in illegal agreements and practices that restrict competition, in particular agreements on prices, conditions and market sharing with competitors. Before employees deviate from standard contracts or procedures provided for in cooperation agreements, they clarify with the Legal Department that this does not involve any inadmissible effects under competition law.

In contacts with competitors and business partners, employees of the LEHVOSS Group do not discuss internal matters, such as prices and terms of sale or financing, costs, market overviews, organisational procedures or

other confidential information from which competitors or business partners could derive competitive advantages, without prior clarification with the Legal Department.

16. Protection of LEHVOSS Group Assets and Protection of Natural Resources

Technical trade secrets and commercial business secrets are important LEHVOSS Group resources. Every employee is therefore obliged to protect them. This includes strict compliance with the LEHVOSS Group's information security regulations.

The assets and business equipment, business documents and working materials of the LEHVOSS Group may neither be misused for private purposes nor handed over to third parties if this could impair the interests of the LEHVOSS Group.

Employees shall strive in their work to protect natural resources and to ensure that the business activities of the LEHVOSS Group have the least possible impact on the environment through material conservation, energy-saving planning and the reduction and recycling of waste. Each employee shall consider environmental and social criteria in addition to economic considerations when selecting suppliers, promotional materials or other external services.

17. Occupational Safety

Processes, operating sites and resources must comply with the applicable legal and internal requirements for occupational safety as well as health, fire and environmental protection.

18. Whistleblower

All staff are strongly encouraged to approach the Legal Department or their supervisor if they notice that someone is not behaving according to the rules. This can prevent small problems from becoming big ones. No employee who makes a report in good faith need fear disadvantages - even if the report turns out to be unfounded. Notifications can also be made anonymously.

Possible compliance violations or human rights abuses can be reported by employees, business partners or affected persons via our anonymous whistleblower channel, accessible via link: <https://www.lehvoss.de/en/company/anonymous-whistleblower-channel/> or via QR code:



19. Consequences in the Event of Infringements

Violations of these rules can result in significant reputational damage and legal disadvantages for the employees concerned, their colleagues and the LEHVOSS Group, up to and including fines, criminal proceedings or restrictions on official permits. Furthermore, violations can lead to measures under labour law by the LEHVOSS Group.

Signature Management Board of the LEHVOSS Group
(Knut Breede, Dr Thomas Oehmichen, Soenke Thomsen)

ANNEX: THE TEN PRINCIPLES OF THE UN GLOBAL COMPACT

The Ten Principles of the United Nations Global Compact are derived from:

- the [Universal Declaration of Human Rights](#),
- the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#),
- the [Rio Declaration on Environment and Development](#), and
- the [United Nations Convention Against Corruption](#).

Human Rights

[Principle 1:](#)

Businesses should support and respect the protection of internationally proclaimed human rights.

[Principle 2:](#)

Businesses should make sure that they are not complicit in human rights abuses.

Labour

[Principle 3:](#)

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

[Principle 4:](#)

Businesses should uphold the elimination of all forms of forced and compulsory labour;

[Principle 5:](#)

Businesses should uphold the effective abolition of child labour; and

[Principle 6:](#)

Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Environment

[Principle 7:](#)

Businesses should support a precautionary approach to environmental challenges;

[Principle 8:](#)

Businesses should undertake initiatives to promote greater environmental responsibility; and

[Principle 9:](#)

Businesses should encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

[Principle 10:](#)

Businesses should work against corruption in all its forms, including extortion and bribery.