

Code of Conduct

Code of Conduct of Schulz & Sohn GmbH Chemie-Erzeugnisse

Announcement from Managing Director Dr Klaus Vitalis Schulz:

***Dear employees,
Dear business partners,***

Fairness and social responsibility were already the basis of my great-grandparents' and company founders' actions. For me, these values are so self-evident that they have become part of my DNA.

These values have also long been the basis of our corporate culture. My aspiration is not only to get things done, but to do them well. Together, we can achieve this even better!

To this end, we are publishing this Code of Conduct so that we can remind each other of our values and goals in our daily work and jointly address any necessary improvements. It is our compass for how we behave towards each other, our partners and the public. It also helps us to make the right decisions.

The Code applies to all employees, management, executives and our business partners.

Everyone is required to share this responsibility and familiarise themselves with its contents.

Düsseldorf, June 2024



SOCIAL STANDARDS

Compliance with laws

We comply with all applicable national and international regulations and laws, the laws applicable in the countries in which we operate, minimum industry standards, ILO and UN conventions, and all other relevant legal provisions. The regulation with the strictest requirements shall apply in each case.

Diversity and equal opportunities

We are committed to providing a social and respectful working environment that is free from discrimination, harassment, bullying and intimidation.

We condemn all forms of discrimination and treat everyone equally. We ensure equal opportunities and equal treatment, regardless of generally protected characteristics such as:

- ethnic origin,
- gender,
- disability,
- religion and belief,
- sexual identity,
- age.

Bullying, harassment and violence in the workplace

We treat our employees with dignity and respect. We do not tolerate any form of harassment, physical coercion, insults or bullying. This includes, for example:

- unwanted physical advances;
- behaviour of a sexual or non-sexual nature;
- insulting, humiliating or hurtful comments;
- derogatory comments, jokes, nicknames or slander;
- non-verbal gestures that imply threats.

Violence in the workplace, including threats and intimidation towards employees and others, will not be tolerated.

Drug abuse

Consumption and/or possession of alcohol, drugs or other narcotics is prohibited in the workplace and on the premises of Schulz & Sohn GmbH.

Misuse of over-the-counter or prescription drugs is also prohibited.

Forced labour

We do not tolerate forced labour. This means that any employment relationship involving the enforcement of work through violence or threats is prohibited. All work must be voluntary.

Employees are free to terminate their employment relationship by giving their employer reasonable notice.

Neither the company nor any entity providing workers to the company may withhold any part of an employee's salary, social benefits, property or documents in order to force them to continue working for the company.

Prohibition of child labour and protection of young workers:

We are actively committed to abolishing child labour. In accordance with ILO Convention 138, we ensure that the minimum age for employment is not below the age at which compulsory schooling ends, and in no case below 15 years of age, or 14 years of age if national law permits this. National regulations for the protection of children and young workers must be observed.

Freedom of association and the right to collective bargaining

Employees have the right to form or join an association of their choice to promote or protect their interests. We recognise the right to collective bargaining. If national law restricts the right to freedom of association and collective

bargaining, employees must at least be permitted to organise themselves independently and freely for the purpose of conducting negotiations. Employees who exercise their right of association peacefully and lawfully must not face disciplinary measures.

Working hours and remuneration:

We comply with all applicable national laws and industry standards relating to working hours. The weekly working time may not exceed the legal limit, i.e. 48 or 60 hours. Any overtime must be voluntary and remunerated separately, or compensated by time off, in accordance with national law. Every employee is entitled to at least one day off after six consecutive working days.

Remuneration is based on applicable laws and collective agreements and is supplemented by the relevant national minimum wage laws. Our employees are regularly informed about the composition of their remuneration.

Our business partners must provide their employees with written employment contracts in accordance with applicable national legislation. In the case of temporary work, the business partner must ensure that their contractual partner complies with these requirements.

Health and safety at work

We ensure that the workplace does not endanger the health and safety of our employees. To this end, we establish and implement clear occupational safety rules and procedures to prevent accidents and health issues at work. Our employees are regularly informed about and trained in these rules and procedures, including occupational safety exercises and legally prescribed health and safety standards. We also ensure that a hygienic working environment is maintained. This also applies to social facilities and, where applicable, employee accommodation.

ENVIRONMENTAL STANDARDS

Environmental protection

As a manufacturing company, we take our environmental responsibilities very seriously. We comply with all national environmental protection laws and regulations. We are committed to avoiding or reducing environmental pollution and continuously improving environmental protection. We adhere to all applicable procedures and standards, especially those relating to waste, hazardous chemicals, other substances, emissions and water protection.

Development of new products

When developing new products and manufacturing existing ones, we ensure that our impact on the environment and climate is minimised. Our approach to product formulation is to use resources and the environment as sparingly as possible.

BUSINESS RELATIONSHIPS

Corruption and fair competition

Any business relationship is based on ethical behaviour and compliance with relevant national and international laws and standards. Any form of corruption, bribery or embezzlement is prohibited. Company management and employees must act in such a way that no personal dependencies or obligations arise. We aim to convince through the quality of our products and services.

Schulz & Sohn GmbH Chemie-Erzeugnisse does not agree prices with competitors.

We select business partners who are committed to acting in accordance with our code of conduct and other applicable guidelines.

Conflicts of interest

Every employee is required to check that business decisions are not influenced by private interests. If a potential conflict of interest arises, it must be discussed with the relevant supervisor or manager.

Data protection

We process, store and protect personal data in compliance with legal regulations. Personal data is collected confidentially and only for lawful, predefined purposes. Employees are obliged to protect confidential and proprietary information belonging to Schulz & Sohn. This obligation continues even after the end of their employment with Schulz & Sohn.

Social commitment

Social responsibility has always been close to the heart of Schulz & Sohn GmbH. The company supports the community through donations, sponsorship, and collaboration with social institutions.

COMPLIANCE WITH THE CODE OF CONDUCT

Implementation of the Code of Conduct

We ensure compliance with the principles defined in this Code of Conduct through appropriate, verifiable measures. Management must regularly review and document compliance with the principles set out here and the improvement measures introduced to uphold them.

We inform our employees of the required standards in an easily understandable way, so they are aware of their rights under the Code of Conduct.

Managers have a special responsibility to communicate the contents of the Code of Conduct to employees by setting an example. They and the management are the first point of contact for questions, providing regular

support to help our employees act in accordance with our values.

Deliberate violations of the Code of Conduct will result in consequences under labour, civil and, if applicable, criminal law within the framework of the applicable regulations.

Verification of social standards

Our business partners, who are accordingly informed, agree to have social audits carried out in their own companies or in the relevant production facilities of their subcontractors at the request of Schulz & Sohn GmbH. These audits may be carried out either by Schulz & Sohn GmbH itself or by third parties authorised by Schulz & Sohn GmbH. If there is any non-compliance with the Code of Conduct, our business partners must take appropriate remedial measures. They will be provided with sufficient time and, if necessary, support from Schulz & Sohn GmbH for this purpose.

Ask questions and report violations

If you have any questions about the Code of Conduct, require assistance, or wish to report misconduct, please contact one of the following points of contact at any time:

At work/in person:

- your direct supervisor or another supervisor you trust
- Team People & Culture
- Feedback boxes at work
- AGG reporting office

Anonymously/digitally:

- Internal reporting office – whistleblower system: Access via our homepage (here you can submit reports completely anonymously and without traceability)
- By email to: compliance@schulzchemie.com

By postal mail to:

Schulz & Sohn GmbH Chemie-Erzeugnisse
Internal reporting office
Höherweg 327
40231 Düsseldorf

We take your concerns seriously and will investigate them promptly and confidentially. We ensure the anonymity of all individuals who report suspected misconduct. No one needs to fear disciplinary action or professional consequences as a result of reporting.

If your concern was not submitted anonymously, we will contact you as soon as possible.