

# **Bruno Bock Group**

## **Code of Conduct**

The Bruno Bock Group stands as a global leader in organic sulfur and epoxy chemistry. Its foundation is built on strong values.

### **Our Purpose**

Our chemistry improves people's quality of life.

### **Our Vision**

Transform to a premier specialty chemical business by providing the most innovative and sustainable solutions through a digitalized and automated customer centric business model.

### **Our Mission**

We deliver customized solutions for demanding applications and combine quality with individuality for the success of our customers. Our motivated employees in combination with our high quality, safety and environmental standards are the foundation for mutually beneficial partnerships.

# Our Values

## Integrity

Our individual and collective behavior shapes the opinions of everyone we deal with. We act in a fair and honest way, complying with all laws and regulations wherever we operate. We all contribute to safeguarding the company's integrity and reputation.

- We compete in a fair and honest way.
- We follow trade restrictions carefully.
- We protect personal and confidential information.
- We maintain a clear distinction between business and personal interests.
- We look after company property and use it appropriately.
- We keep records in accordance with company policies.
- We stay alert to fraud and report suspicious activity.

## Sustainability

Sustainability, environmental and climate protection as well as resource efficiency are key corporate objectives. We ensure all environmental and climate impacts are kept to a minimum and our products make a positive contribution to environmental and climate protection for our customers. Our decision-making processes are based on holistic and long-term considerations and span across generations as we are a family owned business.

## Technology

With our unique knowledge and skills, we contribute to the overall success of the company. We invest in research and development to continually improve and qualify ourselves further for the future.

# Code of Conduct

## Human Rights, Labor and Social Standards

We are committed to the abolition of all forms of child and forced labor, to no discrimination, to civil rights, to collective bargaining and social partnership, to fair compensation and, entitlement to adequate working hours and paid leave as well as maintaining appropriate disciplinary measures.

We believe that respecting human rights, including the rights of children and workers is the right thing to do and critical to the success and sustainability of our business. We

are committed to working towards a future where child and forced labor are eradicated, and workers are treated with dignity and respect. Suppliers must (ensure to) prohibit any sort of child or forced labor in their business operations consistent with the International Labor Organization standards and the United Nations Global Compact principles. We are committed to preventing and eradicating these practices through various measures, including:

- Conducting thorough due diligence to identify and assess the risk of child and forced labor in our supply chains.
- Engaging with suppliers and partners to promote responsible labor practices and improve working conditions.
- Conducting regular audits and monitoring activities to identify and address any instances of child or forced labor.
- Providing support and remedy for any individuals or communities affected by child or forced labor in our supply chains.

## **Labor Relations**

We respect individual rights to freedom of opinion and association, and we recognize the right to collective bargaining, the right of all employees to form unions and employee representative bodies on a democratic basis within the framework of national legislation. Trusting and close cooperation with employee representatives is a key component and established cornerstone of our corporate policy. Mutual trust and cooperative relations are based on an open and constructive dialogue characterized by respect.

Our Pay and benefits comply with the respective national standards and the standards in the national economic sectors, industries and regions. We ensure that working hours and remuneration comply with laws and are fair and just.

## **Equal treatment and non-discrimination**

A culture of equal opportunities and mutual trust and respect is of great importance to us. We promote equal opportunities and prevent discrimination in the recruitment, promotion, training and development of employees. We treat all employees equally, regardless of gender, gender identity, age, skin color cultural background, socio-economic status, ethnic origin, sexual orientation, disability, religion or world views.

Our culture is characterized by our openness and our ability to learn from one another. We treat one another with respect. This enables us to identify common ground, recognize the contributions of colleagues and cooperate constructively.

We do not tolerate a hostile work environment. We work together respectfully to create a climate of acceptance and mutual trust. We recruit, hire, train, and promote our employees based on this principle.

## **Diversity, Equity & Inclusion**

We are fostering a workplace culture that promotes Diversity, Equity and Inclusion (DEI). We recognize that diversity in all its forms is a critical asset for our business and essential for our success in a global marketplace.

To that end, we have established the following commitments as part of our business code of conduct:

- We create a workplace that is welcoming and inclusive to all employees, where everyone feels valued and respected.
- We recruit, develop and promote employees from diverse backgrounds and create pathways to leadership roles.
- We ensure that all employees have equal access to opportunities for professional growth and development, regardless of their background.
- We provide regular training and education for all employees on DEI topics, to promote greater understanding and awareness of diversity and inclusion issues.
- We listen to and act on feedback from our employees and other stakeholders, to continually improve our DEI efforts and ensure that our workplace is an environment where everyone can thrive.
- We hold ourselves accountable for creating and maintaining a workplace culture that is committed to diversity, equity and inclusion.

We believe that DEI is not only a moral and ethical imperative, but also a strategic imperative for our business. By promoting diversity, equity and inclusion, we can better understand and serve our customers and communities, attract and retain top talent, and drive innovation and growth.

## **Career Management**

We provide our employees with the tools and resources for professional development. We believe that investing in the professional development of our employees not only benefits them as individuals, but also strengthens our company and our ability to meet the needs of our customers. We have established a Talent Management System that helps us identify and develop the appropriate talent at an early stage and prepare our employees for their potential roles and responsibilities in the future.

To that end, we have established the following commitments as part of our business code of conduct:

- We strive to recruit and retain talented employees who share our values and have the potential to contribute to our business success.
- We provide our employees with comprehensive training and development opportunities, including on-the-job training, mentoring, coaching, and formal training programs.
- We support our employees in setting and achieving their career goals, and provide regular feedback and performance evaluations to help them track their progress and identify areas for improvement.

- We ensure that all employees have equal access to training and development opportunities, regardless of their position or background.
- We encourage and support employees who seek to advance their careers within our organization, and provide opportunities for career mobility and advancement.
- We regularly review and update our recruitment, training and development practices to ensure they are aligned with our business goals and the needs of our employees.

### **Paying living wages for everyone within the supply chain**

We believe that paying a living wage is the right thing to do. We recognize that the lack of fair compensation is a major challenge for many workers around the world, and we are committed to addressing this issue within our own operations and supply chains.

We work to ensure that all workers, including those employed by our suppliers, earn a wage that is sufficient to cover their basic needs, including food, housing, healthcare, and education for themselves and their families.

We achieve this target by:

- Conducting a thorough assessment of our supply chain to identify areas where living wages are not being paid.
- Working with our suppliers to develop and implement plans to increase wages and ensure that they are paid fairly.
- Providing support and resources to our suppliers to help them achieve compliance with our living wage policy.
- Conducting regular monitoring and evaluation to ensure that our suppliers are complying with our living wage policy, and taking corrective action where necessary.
- Communicating transparently with our stakeholders about our progress towards achieving our living wage target.

### **Protection of Environment, Health and Safety**

We never compromise on safety. Economic considerations do not take priority over safety, health and environmental protection. Occupational safety and health protection are an integral part of all business processes and are included from the outset in all technical, economic and social considerations. We work together to ensure a safe workplace and we are aware and take actions against potential hazards.

Our safety policies serve to protect us and we follow them. We follow and comply with regulatory standards as the minimum. Our high safety standards also apply to employees of all contractors and are considered in selecting and working with contractors.

We protect natural resources and the environment in our area of work.

We comply with all environmental laws and regulations in every country we operate in. We focus on optimizing our environmental footprint by operating an energy management program and reduce waste in our activities.

The Bruno Bock Group is committed to climate protection. Consequently, we establish and maintain greenhouse gas controlling in the form of a carbon footprint and greenhouse gas management.

### **Corruption, Gifts and Entertainment**

The Bruno Bock Group stands for fair competition, in which the supplier with the best products and services prevails. Accordingly, we reject all forms of corruption or attempts to gain improper influence.

We make no financial contributions, in particular donations or sponsorships, to political parties, organizations related or similar to political parties, individual office incumbents or candidates for political offices.

If inappropriate benefits are requested from us in order to win a contract, we take action against them. We ensure that we are awarded contracts based on our performance. We therefore decline inappropriate advantages from external business partners or other external third parties that are intended to influence us or could do so.

The Bruno Bock Group is strictly committed to fighting any kind of corruption. If a possible case of corruption comes to our attention, we investigate and report the incident.

Gifts, business meals or entertainment are to be given or accepted only if intended or understood as simple business courtesies which are consistent with customary business practices and which from the outset rule out any influence on a business decision or an official decree.

### **Antitrust laws and trade control**

Agreements and concerted practices between competitors are prohibited if their objective or effect is to prevent or restrict competition. We expressly decline unlawful agreements with other market players.

We maintain a policy of strict compliance with competition laws and our own rules. We do not enter into agreements and practices that would have a detrimental effect on competition, such as price-fixing, market allocation or abuse of dominant position. We promote our products in a fair and balanced way, with information that has been approved through our internal marketing review procedures.

Any direct or indirect exchange of information between competitors (which can include non-exclusive distributors) is prohibited, such as information on customers, pricing,

costs, salaries, terms of sale, methods of distribution, market shares, production volumes, bidding or strategies (business and research strategies, for example).

We conduct international business in a world that has trade restrictions. Some countries have trade controls that restrict certain business transactions and movement of goods across borders. We comply with all trade controls applicable to our business, and provide accurate and truthful information about our business to customs and other relevant authorities.

### **Money laundering**

Money laundering means the introduction of assets (not only cash) originating from criminal offences into the regular financial and economic cycle.

The Bruno Bock Group fulfils its legal obligations to prevent money laundering and does not participate in such activities. In cases of doubt, all employees are required to report unusual financial transactions which could give grounds to suspect money laundering, to the responsible finance, legal or compliance department for review.

### **Conflict of Interest**

We are committed to ethical behavior and integrity, and we have established guidelines to prevent conflicts of interest. We disclose potential conflicts of interest transparently, avoid activities that could create conflicts, make decisions based on the best interests of our company and stakeholders, comply with laws and regulations related to conflicts of interest, and maintain confidentiality when handling related information.

### **Fraud**

We have zero tolerance for fraud in any form, and we are committed to preventing, detecting, and addressing fraud in all our business activities. We maintain the highest standards of ethical behavior and integrity and comply with all applicable laws and regulations related to fraud prevention. We will take swift and appropriate action to investigate and address any suspected or reported instances of fraud, and we will hold all individuals involved accountable for their actions.

### **Protection of data privacy**

We are committed to protecting the personal data of employees, customers and business partners. We follow applicable laws which ensure that we treat personal data with a high level of care. We abide by these rules to ensure that we keep personal data for legitimate business purposes, and that we are clear about when and how we collect, use or share personal data.

In our digitized world, data can be collected, shared, and evaluated or used quickly and easily. It is therefore especially important that in our personal actions we take care to handle personal data responsibly.

We protect the data entrusted to us by handling it properly, using it only for the intended and authorized purposes, and considering the full rights of the data owner at all times.

Wherever possible, we obtain personal data directly from the relevant individual and maintain transparency about its usage. We protect the data from possible abuse by observing the prescribed safety precautions.

### **Animal Welfare**

The Bruno Bock Group does not conduct testing of its products on animals in the context of cosmetics legislations.

However, toxicological data requiring animal testing is still needed under many pieces of global legislation requirements to ensure the protection of human health and the environment. This is for example the case under the European REACH Regulation EC No 1907/2006 for chemical substances. Alternatives are used whenever possible, scientifically valid and acceptable to regulators.

### **Conflict Minerals**

The Bruno Bock Group ensures that our products do not contain metals derived from minerals or their derivatives originating from conflict regions that directly or indirectly finance or benefit armed groups. In addition, the Bruno Bock Group is taking and performing due diligence within our supply chain to assure that Conflict Minerals or the related metals such as gold, cobalt, tungsten, tin or tantalum are not sourced from mines in conflict areas or illegally taxed on trade routes, which are controlled by non-governmental military groups.