



Code of Conduct

Foreword



Company owners: Annett Preußner (CAO),
Falko Preußner (CEO)

We all work in a grown, medium-sized family business whose inner values account for a large part of the success we have achieved. Values such as honesty, respect, humanity, tolerance, safety and sustainability have always been constant companions in our daily practice. We live these values and our employees appreciate them as well.

We have business partners all over the world, many of which are globally active companies. Since these values, which we live by, are not taken for granted everywhere in the world, it has become common practice for multinational companies in particular to impose or commit to so-called Codes of Conduct, where they define which standards should apply to subsidiaries all over the world. Of course, they also require these standards from their business partners.

In this respect, we have created the following Code of Conduct for VOELPKER, which summarises our standards so that we can show our partners and employees which guidelines apply to us:



Our Values

To make ideas work

We combine tradition and innovation, our know-how is our capital and the protection of our values is the task of every individual.

Fair competition

Our integrity and our clear legal and ethical guidelines are our strength, we convince with performance and produce lasting values.

Appreciation and respect

We stand for diversity and an attractive, safe working environment for each of our employees. At every level of our company, employees give their best and deserve appreciation and respect.

Our common corporate interest

We promote the interest of our company and take personal responsibility to participate together in the success of our company.

Sustainability and foresight

We think and act for a successful future for the well-being of our employees, for the quality of our products and beyond our company.

Table of Contents

I.

Introduction to this Code of Conduct and the implementation of our values | Page 6

1. Scope
2. Employee participation, reporting channels for concerns, whistleblower protection
3. Implementation, documentation and monitoring of this Code of Conduct

II.

To make ideas work | Page 10

1. Intellectual property and corporate property
2. E-mail, internet and information systems
3. Product Safety

III.

Compliance with law and order for fair and clean competition | Page 12

1. Compliance with law, recognised standards and guidelines
2. Anti-corruption, gifts, other benefits and sponsorship
3. Compliance with export law
4. Business partner audits
5. Fair competition – compliance with competition and antitrust law

IV.

Appreciation, respect and protection of our employees | Page 16

1. Diversity, inclusion, strict prohibition of discrimination, violence and intimidation
2. Privacy and protection of personal data
3. Occupational safety and process safety
4. Training and qualification

V.

Our common corporate interest | Page 18

1. Dealing with conflicts of interests
2. External communication and social media
3. Proper handling of business records and accounting

VI.

Sustainability and foresight | Page 22

1. Environment and sustainability
2. Human rights, child labour, forced labour, freedom of association

I. Introduction to this Code of Conduct and the implementation of our values

1. Scope

This Code of Conduct applies directly and without exception to all employees of Völpker Spezialprodukte GmbH. At the same time, we expect our business partners to respect our values and basic principles and to respect them in the implementation of our business relationship.



Practical advice

Any violation of the law from within the company is also a violation of our Code of Conduct and must be reported without exception.

2. Employee participation, reporting channels for concerns, whistleblower protection

We strive to implement the regulations and values provided for in this Code of Conduct in our company in the best possible way. To achieve this, we rely on the cooperation of every single employee. We expressly encourage our employees to report violations of this Code of Conduct, including any violations of the law. In order to ensure this, all employees have the direct reporting channels to their superiors and – if deemed necessary – to the management at their disposal.

For anonymous reports, the already existing "complaint box" is always accessible as a whistleblower mailbox. For each notification of violations, we assure our employees – if requested – that the information will be treated confidentially and that it will be processed and reported back within a reasonable period of time.

We are committed to ensuring that employees who report violations in good faith do not suffer or are threatened with any disadvantages as a result.

More information on reporting compliance violations can be found in the procedural instruction 2.1.05 Umgang mit Compliance-Verstößen.



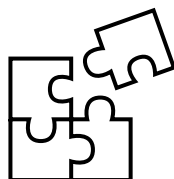


3. Implementation, documentation and monitoring of this Code of Conduct

The enforcement of this Code of Conduct is ensured, controlled and optimised through regular reviews of the relevant processes. The rules laid down in this Code of Conduct are subject to continuous monitoring and can be updated as necessary.



For more information on compliance responsibilities, please refer to **procedural instruction 2.1.06 Import und Export - Annex 1.b.**




"With the Code of Conduct, we look up how to behave in a legally correct, ethical and socially responsible manner so that we maintain our company's good reputation and the trust towards our customers and business partners."

II. To make ideas work

1. Intellectual property and corporate property

Our company builds value, both in the form of tangible assets – for example buildings, installations, technical equipment and facilities – and intellectual assets – in particular know-how, inventions and customer information.

We expect our employees to respect and protect these values and to use company resources responsibly.

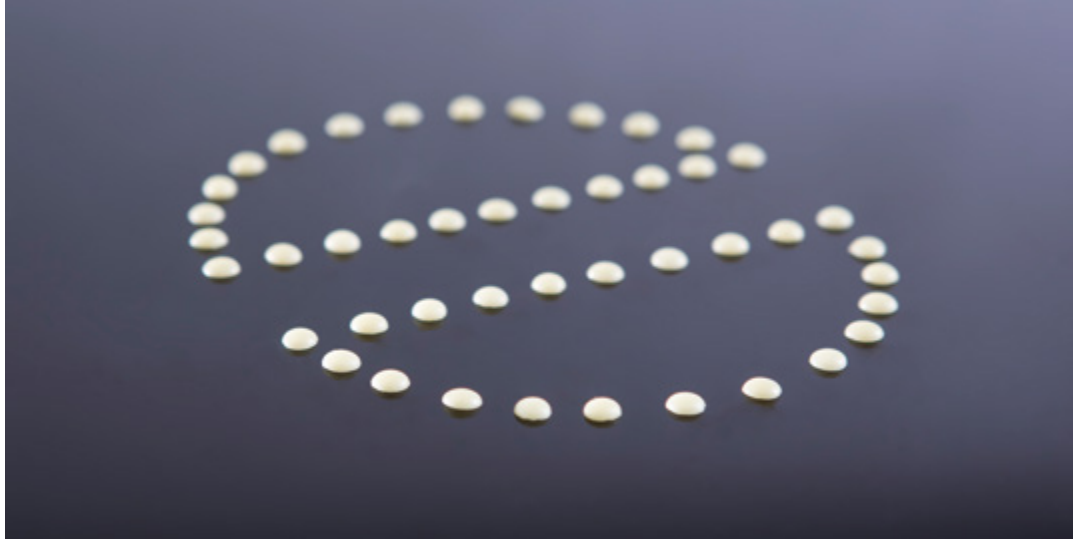


For more information on the protection of intellectual property, including information on non-disclosure agreements, please see **procedural instruction 1.1.06 Geheimhaltungsvereinbarungen**.

2. E-mail, internet and information systems

The Company's email accounts, internet access and other information systems are to be used responsibly and the security and integrity of our information systems are to be protected.






3. Product Safety

We ensure that our products and services comply with all applicable safety standards and do not endanger humans or the environment. To ensure this, we work closely with renowned institutes for qualification and assessment according to national/international specifications.

To communicate safety-relevant information, safety data sheets (SDS) are the most important documents in the supply chain, which we always prepare in accordance with applicable laws. In addition, our products are subject to a large number of other national and international regulations, in particular the EU REACH Regulation.



For more information on product safety measures, please refer to **procedural instruction 2.2.05.01 Sicherheitsdatenblätter**.

III. Compliance with law and order for fair and clean competition

1. Compliance with law, recognised standards and guidelines

The highest premise of our actions is compliance with the law. We actively counteract violations of the law through preventive measures and clarify suspected cases in the long term.



2. Anti-corruption, gifts, other benefits and sponsorship

Any granting or acceptance of an advantage – even remotely – in connection with business decisions constitutes a risk of corruption and is strictly prohibited. The exchange of benefits with business partners outside of specific business decisions must always remain within the bounds of what is customary and appropriate in business and must always be reported to and approved by the superior. The granting of advantages to authorities or public officials in any form is strictly prohibited.

We take our social commitment responsibly and ensure that sponsoring and donation activities are carried out legally and exclusively in the company's interest.

Practical advice



Unlawful action, i. e. any violation of law and order, is never in the interest of the company.

3. Compliance with export law

As part of our export control procedures, we ensure that all deliveries of goods to other countries comply with the licensing requirements of export law and that no deliveries are made to countries subject to embargoes.

The standards and processes laid down in procedural instruction "1.1.10 Exportkontrolle" regulate the export control process and are intended to ensure the security of the supply chain.



For more information on export control, please refer to the **procedural instruction 1.1.10 Exportkontrolle**.

4. Business partner audits

Misconduct by business partners can also have a negative impact on our company. Dealing with suppliers, customers and other business partners therefore always requires an appropriate check of the identity and reputation of the business partner in each case.

In addition, the relevant work checklists must be worked through, especially for export control, before business transactions are concluded.



For more information on inspection obligations towards business partners, please refer to the **procedural instruction 2.1.06 Import und Export**.

5. Fair competition – compliance with competition and antitrust law

We believe in fair competition and never use illegal or unethical methods to gain a competitive advantage. This includes, in particular, the clear prohibition of any activities that violate applicable competition or antitrust law, especially agreements – even informal ones – with competitors on prices, other terms of sale, customers, sales territories and product lines.

IV. Appreciation, respect and protection of our employees

1. Diversity, inclusion, strict prohibition of discrimination, violence and intimidation

We all contribute to a positive corporate climate by always treating each other with dignity and respect.

In particular, no one in our company is discriminated on the basis of race, skin colour, gender, age, ethnic, social or national origin, religion, sexual identity, sexual orientation, political opinion, labour union membership or disability.

Hatred, agitation, harassment and bullying have no place in our company and are consistently pursued and punished.



Practical advice

Employee safety and product safety always take precedence over economic interests. Never ignore possible risks in order to maintain an undisturbed production process.



More detailed information, including comprehensive procedural instructions, can be found in our in-house electronic documentation system ELO.

2. Privacy and protection of personal data

We respect the data protection interests of our employees. In particular, we ensure that any necessary data processing complies with the rules of the GDPR on the processing of personal data.

3. Occupation safety and process safety

The safety of our employees as well as the safety of our production processes are our highest priority. We are aware that the development, production, processing and transport of chemicals require a particularly responsible approach.

We address risks systematically and preventively with appropriate measures such as risk assessments, employee training, systematic maintenance, protective equipment and continuous improvement of safety-related measures.



4. Training and qualification

We offer our employees an attractive working environment that enables personal training and development through individual training and promotes it through a targeted training plan.

V. Our common corporate interest

1. Dealing with conflicts of interest

The interest of our company must always enjoy unrestricted priority over private interests in decisions and actions for or on behalf of the company. Conflicts of interest are to be avoided wherever possible and disclosed without exception.

A conflict of interest is always imminent if personal interests could influence business decisions. Any possible conflict of interest, in particular a close personal relationship to a business partner or any other personal interest in a business transaction, must be reported to the superior without exception.

A transaction that is burdened by a possible conflict of interest may only be carried out after approval by the superior.



REQUIREMENTS

COMPLIANCE



STANDARDS



LAW



TRANSPARENCY

2. External communication and social media

In any external communication that could be attributed to our company, care must always be taken to handle the reputation and external image of our company responsibly.

Any communication in the name of the company and any reference to our company require – insofar as they are beyond the usual everyday business – the prior consent of the management (insofar as not otherwise agreed individually); this applies in particular to media-effective communication and references.





3. Proper handling of business records and accounting

Our company's accounts and records must be complete, accurate and reliable and comply with accepted accounting principles. To ensure this, all employees must comply with

applicable laws, industry standards and company policies when accounting for travel and expenses and when preparing and submitting accounting-related records.



safety
innovative

integrity
confidence



high quality
excellent
products

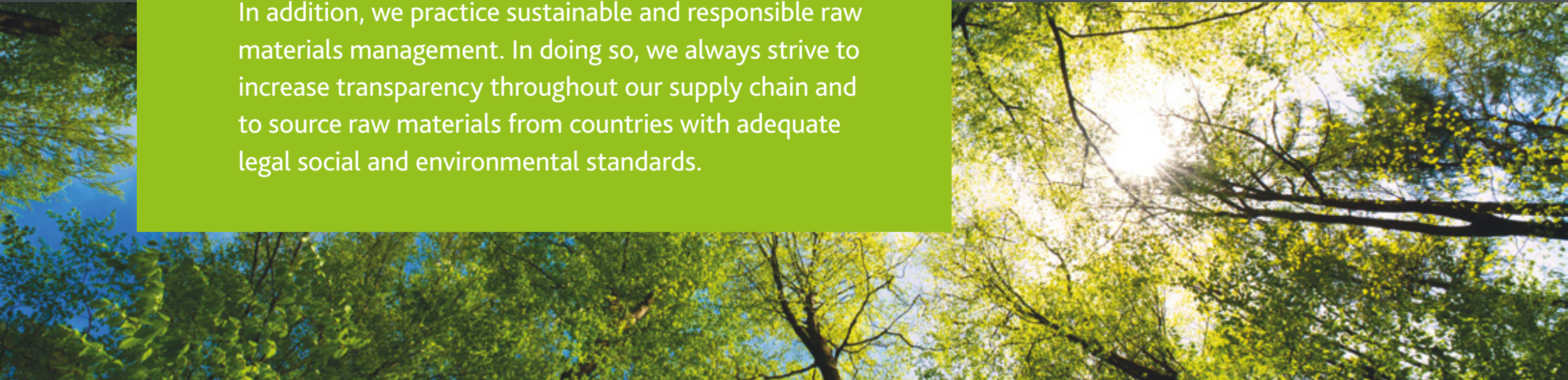


VI. Sustainability and foresight

1. Environment and sustainability

As a company, we strive to be an exemplary member of our regional and national community and work with care and respect for our planet. With this in mind, we control and minimise environmentally harmful emissions and adhere to strict standards. This is reflected in recognised management and product certifications that are regularly renewed.

In addition, we practice sustainable and responsible raw materials management. In doing so, we always strive to increase transparency throughout our supply chain and to source raw materials from countries with adequate legal social and environmental standards.



2. Human rights, child labour, forced labour, freedom of association

We respect, support and promote the observance of internationally recognised human rights as set out in the UN Declaration of Human Rights. Insofar as we become aware of violations of these rights, we immediately initiate measures to remedy the situation. We stand for compliance with labour standards and occupational safety as well as the prevention of child labour.

In our supply chain, we also give preference to suppliers and service providers who share and confirm our fundamental social and environmental values set out in this Code of Conduct. All (potential) business partners are screened before establishing a business relationship – also with recourse to corresponding KYC databases.



For more information, including comprehensive documentation and behavioural instructions on supplier management please refer to our **procedural instruction 3.3.04 Lieferantenqualifizierung**.

Völpker Spezialprodukte GmbH
Fabrikstraße 1 | 39393 Völpke | Germany
Tel. +49 39402 962-0
Fax +49 39402 215
mailbox@voelpker.com
www.voelpker.com

1st Edition | August 2023

