

Code of Conduct for Suppliers (Supplier Code of Conduct)

1. Introduction

Alberdingk Boley GmbH is committed to environmentally friendly and socially responsible corporate management. We expect the same standards from our suppliers. With regard to our employees, we expect them to respect the principles of ecological, social and ethical behaviour and to integrate them into our corporate culture. In addition, we continuously strive to improve our corporate behaviour and our products in terms of sustainability. We actively encourage our suppliers to participate in a holistic approach. In order to regulate our future cooperation, the contractual partners agree to comply with the following rules of conduct, which are to serve as the basis for all future deliveries. The contractual partners undertake to fulfil the principles and requirements of this Code of Conduct. Furthermore, they endeavour to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. This agreement comes into force upon signing. The Code of Conduct is based on national laws and regulations, such as the Supply Chain Due Diligence Act (LkSG) and international agreements, including the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the UN Guiding Principles on Business and Human Rights, the international labour standards of the International Labour Organization and the United Nations Global Compact.

2. Requirements for suppliers

The company that signs this agreement undertakes to fulfil the requirements in the following areas of its social responsibility in all its business activities.

2.1. Ethics

A human rights risk is a situation in which there is a sufficient probability of a violation of one of the following prohibitions due to factual circumstances:

I. Avoidance of child labour

Our suppliers are expressly requested to follow the guidelines of the International Labour Organisation (ILO) with regard to the minimum age for the employment of children. Accordingly, the minimum age should not be lower than the age of compulsory education under applicable labour laws and regulations, and under no circumstances should it be lower than 15 years of age. If children are employed, it is the supplier's duty to document this and ensure that the children are given the opportunity to attend school. Furthermore, it is not permitted to employ persons under the age of 18 for work that could endanger their health, safety or moral development, the so-called worst form of child labour.

II. Violation of the ban of forced labour and all forms of slavery

It is expressly forbidden to use any form of forced labour, slave labour or similar practices. All employment must be on a voluntary basis, without the use of penalties or pressure. Employees must be able to terminate their work or employment relationship at any time without fear of

consequences. Furthermore, any form of unacceptable treatment of workers is strictly prohibited, including psychological stress, sexual harassment and humiliation.

III. Disregard for occupational health and safety and work-related hazards

The supplier is responsible for ensuring a safe and healthy working environment. This is achieved by developing and implementing appropriate occupational safety systems that take necessary precautions against potential accidents and damage to health in connection with work activities. Measures to prevent excessive physical or mental exhaustion must also be implemented. In addition, employees are regularly informed and trained about applicable health and safety standards and measures. The provision of a sufficient supply of drinking water and clean sanitary facilities for employees is also guaranteed.

IV. Disregard for freedom of association, freedom of unionisation and the right to collective bargaining

The right of workers to form and join trade unions, to bargain collectively and to exercise the right to strike must be strictly respected. In situations where freedom of association and the right to collective bargaining are restricted by law, alternative opportunities for independent and free associations of workers to engage in collective bargaining must be provided. It is prohibited to discriminate against employees on the basis of their founding, joining or membership of such an organisation. Workers' representatives must be granted unhindered access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

V. Unequal treatment in employment

Any form of discrimination against employees is prohibited. This includes, but is not limited to, discrimination based on factors such as gender, nationality, ethnic origin, skin colour, disability, state of health, political conviction, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are fully respected.

VI. Withholding of an appropriate salary

The remuneration for regular working hours and overtime must be at least equal to the statutory or industry minimum wage, whichever is higher. The supplier is obliged to increase wages if the remuneration is insufficient to cover basic living costs and to build up savings. All legally prescribed benefits must be granted; wage deductions as punitive measures are not permitted. Clear written information on the pay structure must be provided to employees on a regular basis. Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week. At least one day off must be granted after six consecutive working days. As a rule, weekly working hours should not exceed 48 hours.

VII. Unlawful eviction and causing harmful contamination of soil, air, water

The supplier must not violate legitimate property rights and deprive land, forests or waters whose use is important for the livelihood of people. Any harmful effects on soil, water and air, noise pollution and excessive water consumption must be avoided, especially if they jeopardise the health of people, significantly impair natural resources for food production or hinder people's access to clean drinking water or sanitary facilities.

VIII. Use of security forces in violation of human rights

The commissioning or provision of security forces is not permitted if persons are subjected to inhuman or degrading treatment, if life and limb are threatened or injured or if freedom of organisation is impeded.

IX. Anti-corruption & anti-bribery

In all our business activities, we attach great importance to maintaining the highest standards of integrity and ethics. We expect our suppliers to adopt a clear stance against bribery, corruption, extortion and embezzlement. When working with business partners such as customers, suppliers and government institutions, we ensure a clear separation between the interests of the company and the personal interests of employees. Decisions and actions should be made free from inappropriate influences and personal motives. We assume that our suppliers will work within their companies to ensure that no forms of bribery or corruption, including bribery of foreign public officials, are used. We also expect that no gifts or other benefits are requested, accepted, offered or granted if this could give the appearance of impropriety or dishonesty.

X. Animal protection

Where applicable to the suppliers' business areas, suppliers are expected to minimise animal testing. Where possible, alternatives that are scientifically recognised and accepted by the authorities should be used.

2.2. Protection of the environment

Laws for the protection of the environment must be respected. The undersigned company undertakes to use resources carefully and to minimise the environmental impact. The supplier shall comply with all applicable national environmental laws, regulations and standards. In addition, it actively endeavours to implement internationally recognised environmental management systems, such as ISO 14001. The promotion of environmental awareness within the workforce is essential.

I. Reduce consumption

It is necessary to minimise the consumption of resources during production processes and to reduce or avoid the generation of any type of waste, including water and energy. This can be done both directly at the point of origin and by applying various methods and measures, such as adapting production and maintenance procedures, optimising operational processes, using alternative materials, saving resources, recycling or reusing materials.

I. Dealing with energy consumption/efficiency

It is necessary to monitor energy consumption and document it accordingly. Economic solutions should be sought to increase the efficiency of energy utilisation and reduce energy consumption. The supplier shall implement measures to reduce energy consumption and promote the use of renewable energies. A regular review and optimisation of energy efficiency is part of the operational standards in order to minimise the ecological footprint.

II. Compliance with industry-specific environmental standards

The supplier complies with industry-specific environmental standards that are particularly relevant to the chemical industry. This includes, among other things, the control and reduction of emissions to air, water and soil. The supplier undertakes to implement technologies to reduce emissions and to regularly monitor these emissions. In addition, the supplier is expected to actively participate in sustainable procurement programmes that promote continuous improvement in the areas of environment, health and safety.

2.3. Security and process management

The supplier is obliged to implement appropriate safety standards that meet the specific requirements of the chemical industry. This includes the protection of employees, the environment and the communities in which the supplier operates.

I. Process safety and protection from chemical exposure

The supplier undertakes to implement a comprehensive safety management system based on international standards such as ISO 45001 or ANSI/ASSE Z10. The protection of employees from chemical exposure is a top priority. This includes the provision of appropriate protective equipment, regular training and continuous health monitoring.

II. Emergency planning and response

The supplier must have comprehensive emergency plans in place that are tailored to chemical accidents and other emergencies. These plans must include evacuation strategies, communication protocols with the relevant authorities and measures to minimise environmental damage.

III. Compliance with industry-specific safety standards

The supplier undertakes to comply with all relevant safety standards that apply specifically to the chemical industry, including the SEVESO III Directive on the Prevention of Major Accidents Involving Hazardous Substances.

3. Realisation of the requirements

In the area of risk management, the company is obliged to carry out a thorough risk analysis in accordance with section 2 in order to identify the risks associated with human rights and environmental impacts both in its own business area and at its direct suppliers.

3.1. Identification and management of risks in the supply chain

We expect our suppliers to actively and continuously identify risks in their supply chains and take appropriate measures to minimise these risks. This requires a clear definition of responsibilities within their own organisation.

3.2. Preventive measures and review of effectiveness

Once you have identified risks in your supply chain or in your own business area, the law requires that you immediately implement appropriate preventive measures to minimise these risks. It is also crucial to review the effectiveness of these measures and adjust them if necessary.

3.3. Remedies for violations of human and environmental rights

In the event of imminent or actual violations of human and environmental rights in your supply chain or your own business area, you are obliged to take immediate remedial action to prevent, end or minimise the violation. In your own business area, the remedial measures taken must lead to the cessation of the violation.

3.4. Complaints procedure and information options

In the event of direct involvement, the establishment of a complaints procedure is required by law, which allows (potentially) affected persons in their own business area and in the supply chain, as well as persons who are aware of possible violations, to report human rights and environmental risks and violations. The supplier shall ensure that an effective grievance procedure is in place that enables employees and other stakeholders to report violations of the Code of Conduct confidentially and without fear of reprisals.

3.5. Documentation and reporting

The complete documentation of the fulfilment of your due diligence obligations is of central importance. The supplier undertakes to report transparently on progress in complying with the requirements of this Code of Conduct. The reports should be updated regularly and made available to the relevant stakeholders.

3.6. Independent audits and reporting

The supplier agrees to conduct regular independent audits to ensure compliance with the standards set out in this Code of Conduct and industry-specific requirements. The results of these audits will be documented and communicated to Alberdingk Boley GmbH.

4. Acknowledgement and Consent

By signing this document, the supplier undertakes to act responsibly and to comply with the requirements set out in the principles/requirements and to implement them in its business processes. The supplier is obliged to communicate the contents of this agreement to its employees, authorised representatives and subcontractors in a comprehensible manner. To ensure that the Supplier Code of Conduct is binding, it is advisable to integrate it into the supplier contract. This can be done, for example, by including it as a contractually binding annex or by integrating key Supplier Code of Conduct requirements into the supplier contract. This code of conduct is regularly reviewed and, if necessary, adapted to meet changing legal and regulatory requirements as well as developments in the area of corporate responsibility. This is taken into account when selecting and evaluating suppliers.

The Code of Conduct for Suppliers (Supplier Code of Conduct) was adopted by:

Company _____

Name _____

Function _____

Date, Signature _____

Krefeld, 09.October 2024

Alberdingk Boley GmbH

Timm Wiegmann Thomas Hackenberg

(Management Board) *

** This document was created digitally and is valid without a signature!*