



# Code of Conduct



## **Preamble**

Dear colleagues, dear readers!

Corruption has many faces. With this Code of Conduct we define our compliance rules and guidelines. Why are we doing that? Because everybody should know how to behave in unclear situations. What is right and what is wrong? Sometimes there is not only black or white. For this reason, we need strict guidelines, according to which everyone in the company acts.

This code describes how to deal with inappropriate behaviour in connection with employees, suppliers, customers, competitors, interested parties and business partners. This is about property, including intellectual property, conflicts of interest and information. We define our values and what defines us at Alberdingk Boley: We are honest and authentic and behave seriously and fairly. We manufacture environmentally-friendly products and think and act sustainably. With this code of conduct we record what we are already living for a long company history and what we prove anew every day.

Take your time to read! And, if you should ever get into a situation in which something 'seems to be strange' to you, do not hesitate and talk to your manager or directly to us. Always being there for you!

Always being there for you!

Timm Wiegmann    Thomas Hackenberg



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## Corporate policy

Our environmentally friendly binders refine, refurbish, link and protect surfaces. As an independent and globally operating middle-sized enterprise, Alberdingk Boley has been a partner for our customers for more than 249 years. That makes us special:

- 🌱 highest quality of our products and services
- 🌱 technique and innovation
- 🌱 a wide range of technology
- 🌱 our tradition is close customer relationship
- 🌱 a high appreciation of our employees
- 🌱 certified best practise safety
- 🌱 flexibility
- 🌱 sustainable thinking and care

Challenges inspire us! We provide the best solution for our customers.



## Code of Conduct for Alberdingk Boley

Alberdingk Boley undertakes to act in accordance with the following rules. We are happy to prove this - even with unannounced visits, for example. Currently, during the COVID-19 pandemic, visits that have not been agreed upon are not possible for reasons of infection protection. In the following text, Alberdingk Boley is also referred to as 'the company' or 'the organization'.

### Gender-specific terms

For reasons of better readability, we do not use gender-specific terms. So when we speak about 'the employees', we mean all employees, regardless of their gender.

### 1. Compliance with Applicable Laws

Alberdingk Boley complies with local, national and international law. We also strictly adhere to the requirements for environmental, health and occupational safety. We regularly face assessments by auditors and associations and are certified accordingly. You can find more about this on our homepage under 'Quality & Environment & Security'.

### 2. Working conditions

A high level of appreciation for employees is part of Alberdingk Boley's self-image and is accordingly defined in the guidelines. As a company, we value attractive working conditions and compliance with human rights and equal treatment in the work environment. This also includes the following points:

#### Prohibition of sexual harassment and discrimination

We strongly condemn sexual harassment and sanction it accordingly. The same applies to bullying and disrespectful behaviour among colleagues. No matter what peculiarities someone was born with, what country someone was born in, what religion someone practices, what sexuality he or she lives: no one has the right to harass this person, e.g. by asking too intimate questions, making derogatory statements, etc. Mobbing. We stand by that! In the event of violations through socially unacceptable behaviour or against applicable laws, we will take appropriate operational and labour law measures. The legal basis for this is provided by the ban on discrimination in force in Germany.

Hiring decisions must be made solely on the basis of the employee's qualifications. The employee's race, colour, gender, nationality, religion, age, maternity, marital status shall not be a consideration in decisions regarding salary, benefits, promotion, discipline, termination or advancement.

### **Prohibition of forced labor**

Nobody is forced to work at Alberdingk Boley. The company expressly distances itself from prison or forced labor.

### **Prohibition of child labor**

No person under the age of 16 is employed in the company. If the local legal age for work is greater than 16 years, the organization will not employ anyone younger than the legal age.

### **Working hours**

The organization ensures that employees' working hours comply with local laws. In no event must an employee work more than sixty (60) hours per week or more than six (6) days for seven (7) days.

All employees of the organization are free to refuse the requested overtime without threat of dismissal, punishment or penalty.

### **Wages and benefits**

All employees of the organization receive the higher amount of the statutory minimum wage and the statutory benefits or the wages and benefits applicable in the industry, whereby the employee is presented with a written statement during each compensation period in which the employee's compensation and any deductions from the employee Numbers are clearly visible.

Alberdingk Boley adheres to the agreed tariffs. The organization undertakes to pay higher hourly rates for late shifts than for normal shifts. The organization is not allowed to deduct penalties for disciplinary offenses from employee wages.

### **Non-discrimination**

The organization makes recruitment decisions solely on the basis of the qualification of the employee to carry out the respective assignment. The organization may not make decisions regarding hiring, salary, benefits, promotion, discipline, termination or promotion based on the race, color, sex, nationality, religion, age, maternity or marital status of the employee or meet a potential employee.

### **work environment**

Alberdingk Boley attaches great importance to occupational safety. The company is committed to maintaining a work environment that is safe and healthy. Our goal is to fully comply with all applicable laws and regulations relating to working conditions at all times.

### **3. Privacy**

Alberdingk Boley uses technical and organizational security measures to protect the data provided by employees and business partners from accidental or intentional manipulation, loss, destruction or access by unauthorized persons. In the case of the collection and processing of personal data, e.g. when using our homepage, the information is transmitted in encrypted form in order to prevent misuse of the data by third parties. Our security measures are continuously revised in line with technological developments.

#### **GDPR guarantee for Alberdingk Boley's partners**

The company guarantees compliance with the General Data Protection Regulation (GDPR). We are also bound by contract and confidentiality agreements with our business partners in order to achieve maximum trust and transparency on both sides. We undertake not to violate any industrial or intellectual property rights of third parties. Our employees also undertake not to disclose any confidential business information orally, in writing, in person or electronically without express permission. Confidential information from Alberdingk Boley's business partners is subject to a duty of confidentiality and is treated with the same care that Alberdingk Boley takes to protect its own information.

#### **Protection of copyrights and personal rights**

When using images, photos, texts and products in official Alberdingk Boley media, e.g. on the homepage, in presentations or other publications, we are obliged to observe the respective copyrights and personal rights. Via data protection declarations and written declarations of consent from the persons shown, we ensure that these are only used if the rights of use have been transferred to us beforehand and within the framework of the agreement. We only use images of people with their consent or within the framework of the legally permissible possibilities.

### **4. Dealing with company property**

The employees handle the assets of Alberdingk Boley carefully and appropriately. You only use them for activities that serve business purposes. Company property also includes communication facilities and immaterial values such as knowhow and industrial property rights. Without the express consent of the responsible manager or through a corresponding company regulation, facilities or objects of the company are not used for private purposes or removed from the company premises.

## **5. Compliance with applicable rules in competition and antitrust law**

Alberdingk Boley expects its employees to strictly comply with the applicable laws in the field of competition and antitrust law in all countries in which the company does business.

### **Prohibition of anti-competitive agreements**

Alberdingk Boley is a privately owned company and defines its own business strategy completely autonomously and independently. The company expects employees to be extremely careful when dealing with Alberdingk Boley's competitors. It is strictly forbidden to make arrangements with competitors, e.g. setting sales prices, controlling or manipulating sales markets, influencing tendering procedures or dividing up territories. In unclear situations or if there are suspicions, employees are obliged to inform their superiors. Employees are also prohibited from influencing the resale of ALBERDINGK® brand products.

### **In the event of a breach of competition law provisions**

Violations of competition or antitrust law are severely punished by the antitrust authorities. The catalogue of measures includes the annulment of agreements as well as high fines of up to 10% of the company's annual global turnover, as well as claims for damages by the victims by the competent civil courts, imprisonment and fines as well as internal disciplinary measures.

## **6. Honesty and Ethics in Business**

Alberdingk Boley looks back on a long history. Integrity and honesty are the foundation of our company and are exemplified by the management. We undertake to comply with international agreements and applicable legal provisions in the field of anti-corruption and to apply them in the fight against improper influence in all countries in which the company is active. We condemn all forms of fraud and corruption. We are aware that corruption has many faces and we sensitize our employees accordingly.

No employee may, either directly or indirectly, offer, provide, guarantee, demand or accept an illegal benefit, monetary or otherwise - in order to effect a business relationship or a favor. It does not matter whether the person concerned is e.g. a customer or prospect, a political party, a financial institution or an official. Our requirement for honesty and ethics in business life leaves no room for such morally reprehensible behaviour. Accordingly, the company takes care to select trustworthy business partners in order to prevent such situations from occurring in the first place.






## **Gifts and invitations**

The company also expects greater attention from employees when it comes to accepting gifts and invitations. These must be strictly limited. If business attention can be considered dissolute, it should be refused. Alberdingk Boley expects employees to be vigilant and to be able to objectively assess whether a gift given by a business partner or an invitation to an event can influence a business relationship. All employees have access to this Code of Conduct at all times and know that if they fail to comply, they will face disciplinary action. In case of doubt, employees are required to enter into a dialogue with their superiors.

## **7. Compliance with import and export regulations**

Alberdingk Boley is internationally active and supplies customers all over the world. We are committed to complying with the applicable rules of international trade.

This contains:

-  Strict adherence to the rules of registration and licenses / permits in the field of import and export to which our products are subject
-  Compliance with the rules of trade restrictions for both import and export - these can affect a country as well as a trading partner or product. Trade restrictions, such as embargoes or boycotts, against a certain country or for certain products are caused by national or international regulations and legal provisions. Trade restrictions for chemical substances that are illegally used for purposes other than those for which they are intended, such as the manufacture of chemical weapons, drugs or explosives, are strictly observed.
-  In the event of a violation of these rules, Alberdingk Boley and the employees involved expose themselves to the risk of sanctions that could damage the business and reputation of Alberdingk Boley.

## **8. Respect for the environment and sustainable action**

Alberdingk Boley produces environmentally friendly binders and refines natural oils based on renewable raw materials. Sustainability is an integral part of our guidelines. We face the international comparison by the world's largest provider of sustainability ratings for companies, EcoVadis ([www.ecovadis.com](http://www.ecovadis.com)), and follow the guidelines of 'Responsible Care®', a voluntary initiative of the chemical industry. Alberdingk Boley is DIN ISO-certified with regard to environmental, safety and energy management, and adheres to REACH (European Chemical Regulation), which regulates the manufacture, marketing and use of chemicals. You can find more about this on our homepage under 'Quality & Environment & Security'.

Environmental protection and sustainable action at and by Alberdingk Boley are also implemented through:

- 🌱 Responsible use of products
- 🌱 Risk prevention and regular safety inspections to identify and eliminate possible sources of danger
- 🌱 Use of technologies that protect the environment
- 🌱 Regular reporting on business activities
- 🌱 Efficient and sustainable use of resources
- 🌱 Waste management
- 🌱 Reduction of emissions
- 🌱 Networking and cooperation with authorities to think outside the box with regard to health, safety, the environment and quality

## **9. Participation and involvement of employees**

A high degree of appreciation for our employees is part of our guidelines. This means that we attach great importance to the opinions of our employees. We regularly provide information about our current and planned projects and involve employees in business decisions with the aim of constructive cooperation between management and employee representatives. We want colleagues who think for themselves and reward good ideas with an internal suggestion system.

This Code of Conduct is the result of a project work on the subject of compliance. It is also valid without a handwritten signature. We implement the code of ethics in our company and expect the same from our employees, business partners and those who would like to become one.

Krefeld, July 16, 2024

Alberdingk Boley GmbH

Timm Wiegmann    Thomas Hackenberg

(CEO) \*

(CFO) \*

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

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## **Imprint**

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