

Declaration of Principles on Human Rights and Business Ethics

1. Introduction: Consolidation of the respect of human rights in the business culture and internal processes

Our company, Alberdingk Boley GmbH, is one of the leading suppliers of waterbased polymere dispersions. With our environmentally friendly acrylic and polyurethane dispersions, polyols and oil products we offer the right product for nearly every application. We attribute great importance to ethics, sustainability and legal compliance, which are firmly anchored in our corporate strategy. Our aim is to strengthen respect for human rights and environmental protection and to prevent, minimise and, if necessary, correct violations. This commitment extends both to our internal corporate activities and to our global supply chains.

2. Commitment to safeguarding human rights and relation to international standards

We recognise our corporate responsibility to respect human rights and are committed to respecting human rights not only in our own business activities, but also in our global supply and value chains. We are committed to ensuring that those affected by human rights violations have access to the necessary remedies. Our business activities are based on the internationally recognised Guiding Principles on Business and Human Rights (UNGPs) and thus implement the requirements of the National Action Plan for Business and Human Rights (NAP).

Our human rights due diligence processes are based on the following international human right documents, to which we are fully committed:

- United Nations Universal Declaration of Human Rights (UN)
- United Nations Guiding Principles on Business and Human Rights (UNGP)
- Conventions and Recommendations of International Labour Standards (ILO) regarding labour and social standards
- Principles of United Nations Global Compact (UNGC)
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- Basler Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal

3. Human Rights in Operative Business and Business Relations

We are aware that our business activities and our global supply and value chains harbour potential risks for human rights violations. As part of our risk analysis, we have identified the following key risk factors for our company:

Production in conflict and high-risk areas:

Our raw materials could originate from regions characterised by armed conflicts or unstable political conditions.

Violation of the prohibition of child labour:

The use of child labour is strictly prohibited at all stages of production. We are committed to complying with ILO guidelines and ensuring that no children are employed in hazardous working conditions.

Violation of the ban on forced labour and all forms of slavery:

Our employment relationships are entirely voluntary and free from coercion or pressure.

Human rights in business operations and business relationships:

In addition to observing internationally recognised and codified human rights as set out in the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights, we have undertaken further assessments to identify the potential risks that are material to our business activities. Human rights considerations are integrated into our business activities and supply chain management, and we regularly update our measures to prevent or minimise human rights and environmental risks.

Working environment:

All employees are to be treated with dignity and respect; harassment and abuse are not tolerated. We are convinced that the diversity of our employees enriches the company. We therefore value diversity and do not tolerate discrimination.

Disregard for occupational health and safety and work-related health hazards:

Occupational health and safety are at the top of our agenda. In addition to our own employees and the employees of partner companies, this explicitly includes neighbours and residents living near our sites worldwide.

Disregard for freedom of association freedom of unionisation and the right to collective bargaining:

We respect and support the right of employees to organise and bargain collectively. We are committed to the fundamental right to form, join or consider joining trade unions and to engage in collective bargaining. We are committed to working with our employees and their representatives in a spirit of trust, in accordance with the conventions and recommendations of the International Labour Organization (ILO).

Withholding of an appropriate wage:

We ensure that wages and salaries comply with legal or industry standards and are sufficient to secure the livelihood of our employees. We pay fair and performance-related wages. Our wages meet or exceed legal or industry standards.

Unlawful eviction and harmful pollution of soil, air and water:

We pay strict attention to compliance with environmental protection standards and respect the property rights of the communities concerned.

Use of security forces with disregard for human rights:

Security forces are commissioned in strict compliance with human rights. We take responsibility for the safety of our employees, our sites and transport as well as for particularly sensitive information.

Anti-corruption & Anti-bribery:

We set the highest standards of integrity and ethics in all business activities and pursue a zero-tolerance policy towards corruption and bribery. We share the understanding that corruption harms human rights. Accordingly, we do not tolerate corruption of any kind ("zero tolerance") and are committed to fair business practices.

Child labour, forced labour and human trafficking:

We do not tolerate child or forced labour. This also applies to any form of slavery and human trafficking. In accordance with our specific policy, we ensure that ethical labour practices are observed in all business areas.

Effects of our products:

Our product stewardship activities aim to identify and assess potential health or environmental risks of our products at an early stage in order to continuously minimise potential negative effects even further. We endeavour to offer products that contribute to sustainable development and the achievement of the UN Sustainable Development Goals (SDGs).

Business partner:

We identify human rights risks in our business relationships. Wherever we become aware of violations of human rights principles, we press for these to be remedied immediately. Where this remains fruitless, we will ultimately terminate business relationships. We therefore expect our business partners to act in accordance with this declaration of principles.

Communities and indigenous peoples:

At our sites, we see ourselves as a partner and good neighbour that respects the rights of local residents and contributes to positive local development. We recognise the rights of indigenous peoples in accordance with the United Nations Declaration on the Rights of Indigenous Peoples.

4. Implementation of Measures

Our approach to fulfilling our human rights due diligence obligations is based on a thorough internal risk analysis, which is continuously developed. Human rights are an integral part of our corporate culture and are actively integrated into our operational management processes. Specific contact persons have been defined within the company who are responsible for implementing these procedures.

Prevention:**Define responsibilities:**

Managers are obliged to take the Human Rights Code into account in their daily work and to carefully clarify potential violations.

Define contact person:

The Human Rights Officer is available as a central point of contact.

Internal cooperation:

Employees are regularly trained and sensitised. Our procurement strategies are adapted accordingly in order to minimise risks.

Complaint mechanism:

A whistleblower system enables the confidential reporting of possible legal violations in accordance with the Supply Chain Due Diligence Act (LkSG).

Effectiveness monitoring:

The effectiveness of our measures is monitored through regular reviews and reinforced where necessary. This includes both internal audits and reviews of our supply chains.

Remedy:

In the event of human rights violations, we take immediate action to end or adapt our business practices and are committed to making good the damage caused.

Business partner:

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5. Outlook and Reporting

Alberdingk Boley GmbH is aware that the implementation of human rights and environmental due diligence in its own business activities and in supply chains is an ongoing process. We accept the challenge and regularly review the strategic approaches and measures with the aim of continuous improvement. Alberdingk Boley GmbH provides regular and transparent information on implementation and strategic developments as part of its annual sustainability reporting.

Krefeld, the 04th of October 2024

Alberdingk Boley GmbH

Timm Wiegmann Thomas Hackenberg
(Management Board) *

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