

HOESCH Code of Conduct



1. Principle

This Code of Conduct has been drawn up for the HOESCH Group and reflects our principles of conduct and values as a globally operating company.

We are firmly committed to always acting in accordance with applicable laws, regulations and ethical principles. Both our employees and management are aware of this responsibility. Our employees are regularly provided with information about all relevant internal regulations.

2. Adherence to legal and ethical standards

As a globally active company, we are aware of our legal, social and environmental responsibilities. We advocate contracts with our business partners under fair and transparent conditions and expect our partners to have a similar attitude. We distance ourselves from anti-competitive practices such as price fixing and similar actions.

Market research is necessary and, of course, permitted; likewise, the opportunity to meet market participants within the context of international conferences is permitted as long as antitrust limits are adhered to.

We undertake to comply with the applicable law and other relevant provisions when doing business and expect the same from our business partners. Each employee is obliged to separate their private interests from those of our company. Decisions must not be influenced by private interests or personal relationships; any possible conflicts of interest must be immediately disclosed.

We do not tolerate bribery or other corrupt or fraudulent practices. The granting of personal benefits such as payments and loans, gifts, or invitations to events with the aim of conferring an advantage, are not permitted. We will only give or accept gifts or

invitations if they are of moderate value and can be deemed a gesture of courtesy in accordance with general business practice.

The HOESCH Group is committed to cooperating with all relevant authorities.

3. Social responsibility and human rights

The HOESCH Group respects and supports internationally recognised human rights. All employees at all locations are treated with dignity and respect. We oppose any form of discrimination; this particularly refers to discrimination against employees on the grounds of gender, race, disability, ethnic or cultural origin, religion or belief, age or sexual orientation.

We strongly reject any form of child labour, forced labour in any form, or any form of human trafficking.

We advocate fair working conditions, and working hours are in accordance with local working time legislation.

Fair pay is an important aspect of what we do. Statutory minimum wages are always respected; we also expect the same from all our business partners.

Occupational health and safety are outstanding aspects of our daily work and the ongoing improvement of the working environment is an important factor for us. Health and safety are of the highest priority. We want every employee to go home as healthy as when they came to work.

4. Environmental responsibility

The HOESCH Group is committed to its environmental responsibility. Environmental protection and the careful use of all resources are important to us. The optimal use of all sources of energy, as well as ongoing improvements in energy efficiency at our sites, remain a high priority for us.

We avoid sourcing raw materials from conflict and high-risk areas. Sustainability is always at the forefront in the procurement of raw materials and energy.

We always strive to avoid hazardous substances, but if we must deal with such substances, we are committed to ensuring the highest possible level of safety for both our employees and the environment. Prohibited substances are not manufactured or brought onsite.

Strict compliance with legal requirements remains the focus for all our activities.

5. Sanctions and export control

No employee of the HOESCH Group may knowingly participate in transactions with third parties that are subject to economic sanctions or embargoes.

Similarly, no substances that are subject to export control legislation may be placed on the market without receiving prior authorisation from the competent authorities.

6. Protection of intellectual property rights / trade secrets

The results of our research and development work, which may translate into intellectual property rights, are valuable assets and of great importance to our company. The details shall be kept secret and confidential until any possible publication.

Our employees respect confidentiality and confidential business information and documents may not be disclosed to third parties or made available in any other way.

7. Data security / Data protection

Our employees are bound by confidentiality. Personal data shall be processed so that the

rights of data subjects are ensured. Among other things, this includes their right to the confidentiality and integrity of their data.

Personal data may only be processed if a legal regulation, a collective agreement, or consent permits it to be processed, or if the processing of such data is mandatory. Personal data may only be processed to the extent and in the manner necessary for the performance of assigned tasks.

8. Compliance

The aforementioned principles are an active part of our HOESCH corporate culture. It is important to us that both our employees and management are aware of these principles and operate within the permitted legal possibilities.

New employees are immediately informed about these guidelines when they start work, and they are also available for all employees to view at any time.

We expect our business partners to at least adhere to our principles and to introduce their own conduct guidelines. The right is reserved to set higher requirements in respect of individual points.

Acknowledgement of our Code of Conduct forms an integral part of all contractual agreements.

We reserve the right to terminate a business relationship in the event of a recognisable infringement, irrespective of any existing contracts.

The HOESCH Group