



OQEMA

Corporate Compliance Policy

OQEMA Group Code of Conduct

Dear Colleagues,

For us in the OQEMA Group, economic success and corporate social responsibility have always belonged together. Responsible and lawful conduct, both internally and externally, is an elementary aspect of our corporate culture. They form the basis for the trust that our customers, principals, business partners and the general public place in us. It is all a question of mutual respect, our dealings with business partners and public authorities, conflicts of interests, risk avoidance and prevention, health, the environment, safety and many other topics. It goes without saying that we comply with the law in all our business activities. Failure to do so is not a minor misdemeanor. It harms the reputation of our company and can lead to serious legal consequences for us. Every single one of us is therefore obliged to act responsibly and to comply with the law.

The internationalization of our business and the large number and complexity of laws and regulations involved inevitably increase the risk of violations of the law.

Corporate compliance means lawful and proper conduct and is the guideline for all our decisions and our conduct. A binding minimum standard.

Executive Board of OQEMA AG



Mutual Respect

Equal opportunity and mutual trust

A culture of equal opportunity and mutual trust, of openness and respect is actively practised. Equality of opportunity is promoted. Discrimination is not tolerated, particularly during the recruitment of staff and the promotion of employees, or in the granting of training and further qualification measures. Sexual harassment and all other forms of abuse at the place of work are forbidden.

Human rights

We respect human rights in accordance with Article 1 of the German Constitution in which human rights are cited as forming the basis of any human society and as fundamental to peace and justice in the world, and in accordance with the UNO human rights declarations and conventions.

Employee rights

Employee rights form an important part of the OQEMA corporate culture. These also include the right to reasonable remuneration. Pay and other benefits correspond to at least the respective national and local legal standards and the level of the national economic sectors or industries. We reject child labour and forced labour in any shape or form. In accordance with the ILO core labour standards, we attach importance to fair working conditions, a safe working environment and adequate remuneration of our staff. We also respect and support the right of our staff to freedom of association and collective and tariff negotiations.

Health and labour protection

Our warehouses and plants are planned and operated in strict observance of the safety regulations. The health and safety of our employees rank equally as corporate objectives alongside product quality and business success. Occupational health and safety therefore form an integral part of all operational processes. Alcohol should not be consumed during working hours. Moderate consumption of alcohol is permitted within the normal social framework, for example during customer events, business dinners and festive or social occasions (Christmas or birthday parties). The possession or trafficking of drugs and other substances which impair the powers of judgement and occupational health and safety is forbidden.

All our employees promote health and safety in their working environment and observe the corresponding regulations. All management staff are obliged to instruct and support their employees in the observance of this responsibility.



Business Conduct

Responsible and lawful conduct

Compliance with the law is for us a fundamental principle of commercially responsible action. That applies even if this results in economic disadvantages or difficulties for the company or individual persons. The OQEMA Group has operations throughout Europe. The activities in Europe are subject to a wide variety of national and international legal regulations.

Disclosure and resolution of conflicts of interests

We take a large number of decisions every day. These should always be guided purely by the question: What is good for OQEMA? Decisions on the grounds of private interests or other economic or other activities, also those of dependents or other related persons or organizations, should be avoided from the outset. If decisions can no longer be taken in the interests of the company, please inform your superior, the management or the executive board.

Fair competition

We are committed to fair dealings with our business partners and third parties and support fair and undistorted competition in compliance with competition and anti-trust law. Relationships or agreements with competitors, suppliers, distributors or dealers that may interfere with fair competition are prohibited by law in virtually all countries. Such legal prohibitions apply i. a. to price fixing, allocations of customers or sales territories between competitors, anti-competitive boycotts and other unfair methods of competition. We are committed to fair competition and comply with the respective laws and regulations. In this context, the avoidance and combating of corruption takes on particular importance, because violations of the laws can result in severe penalties, obligations to pay compensation and criminal prosecution – for OQEMA and for the person(s) involved. The public reputation of OQEMA can also be severely damaged. Help us to protect our company against corruption.



Behaviour within Society

Environmental protection

Sustainability is an important corporate goal for us also when it comes to environmental protection. Environmental legislation lays down binding standards here that we at least observe. Every employee bears responsibility for conserving natural resources and for contributing to environmental and climate protection through his/her conduct.

Donations and sponsoring

We regard ourselves as active members of society and are therefore involved in a number of different ways. We give donations on a voluntary basis without any expectation of reciprocal consideration. We do not make donations to political parties, individuals or organizations whose objectives contradict the principles of a democratic legal system or the goals of our corporate culture. All donations are transparent and traceable. The identity of the recipient and the intended use of the donation are known and the reason for the donation and the purpose for which it is to be used are legally justifiable. With our sponsoring activities, we support education and science, culture and sport.

Interaction and communication with the general public

We respect and observe the right of free expression and the protection of individual rights. All employees should be aware that they can be perceived as part of and as representatives of OQEMA even in their private lives, and they are therefore called upon to avoid damaging the standing and reputation of the company through their behaviour and conduct in public, and particularly towards the media. Where private opinions are expressed, we take care to dissociate the function or activity within the OQEMA Group from the private opinion.



Handling of Information

Reporting

We attach importance to true reporting and communication on the company's business activities to investors, employees, customers, business partners, the public in general and state institutions. Every employee ensures that both internal and external reports, records and other company documents are in conformity with the applicable laws and standards, and are therefore complete and correct at all times.

Confidential company information

All our employees are obliged to treat business and trade secrets that are entrusted to them as part of their work for the company or which they learn of in any other manner with the strictest confidence. Secrecy must be maintained on work and procedures in the company of major importance to the OQEMA Group or its business partners and which have not been made public. Particular care must be taken when exchanging information in electronic networks.

Data protection and data security

Access to the Internet, global electronic exchange of information and electronic transactions are vital preconditions for the effectiveness of OQEMA and for the company's success as a whole. The benefits of electronic communication are associated with risks for personal privacy protection and data security. The taking of effective precautions to combat these risks constitutes a major aspect of IT management. Personal data may only be collected, processed or used insofar as this is required for specific, clearly defined and lawful purposes. High standards are observed in the data quality and in the technical protection against unauthorized access.



Protection of corporate property and other assets

For us, responsible handling of company property, i. e. of products, equipment and intellectual property rights is a matter of course. Company property and assets must be protected against misuse, loss or theft. We use the company's material and immaterial assets only for company business and not for personal gain, unless expressly permitted. Any form of fraud is forbidden, irrespective of whether company assets or the assets of third parties are harmed. Appropriate control measures are designed to prevent any form of economically damaging act (e. g. breach of trust, theft, embezzlement, tax evasion or money laundering). The intellectual property of our company is also an asset that we protect and defend against unauthorized access by third parties.

Implementation and contacts

Every employee orients his or her actions to the principles of this Code of Conduct. Management staff are particularly obliged to fulfil their role model function, to behave with integrity in everyday business and to inform the employees in their area of responsibility about the basic values on which this Code of Conduct is based and to integrate this Code of Conduct into employee training. Every employee is expected to seek advice or help from his/her superior if he/she has doubts about the legal implications of his/her own conduct or if there is any indication of legally dubious practices in his/her working environment. Openness and trust are of very great importance, particularly in cases where the company could otherwise suffer damage. All employees as well as third parties (customers, suppliers, etc.) can also send any further questions relating to the Code of Conduct and compliance to the central e-mail address compliance@oqema.com.

Whistleblower System

OQEMA has introduced a "whistle-blower system" to uncover possible violations of laws or regulations. For reports of possible violations of laws and directives, every employee also has the possibility of sending an e-mail to compliance@oqema.com or contacting a compliance officer directly. All information will be treated on an anonymous basis and with strict confidentiality.

Corporate Compliance on the Intranet

The OQEMA GRC Portal (Corporate Governance, Risk Management and Compliance) provides a variety of information and counselling possibilities.