



GLOBAL CODE OF CONDUCT

ASK Chemicals Group



ASKCHEMICALS



Introduction

All of us want to contribute to the success of **ASK Chemicals Group**, with innovative solutions. We can only **accomplish to be successful** if all our stakeholders (customers, suppliers, shareholders, banks, service providers, and the public) trust us. For all of us this implies that we act **ethically** and in **accordance** with the applicable laws and regulations. This will always be our guiding principle when conducting business.

Appropriate behaviour is essential for being a responsible corporate citizen. Unethical and illegal behaviour may lead to huge costs to the company, not just in terms of fines or imprisonment, but also may cause investigations by legal authorities, which could interrupt our business operations. Further misconduct of our employees, managers and executive board members (jointly referred to as the **“Employees”**) may have a significant negative impact on ASK Chemicals Group’s reputation.

Therefore, we want to ensure that we all, regardless of our job responsibility, commit to this **Code of Conduct** to prevent ASK Chemicals Group and ourselves from damage caused by misconduct. For this reason, ASK Chemicals Group adopted this Code of Conduct as well as a set of **manuals, guidelines** and other **complementing documents** (compliance documents), to which **all Employees** must adhere.

Hilden, September 27, 2021

Naturally, this Code of Conduct and compliance documents will not regulate all relevant aspects. We ask all Employees to be guided by **generally recognized ethical principles** and to act with good judgement in all aspects of ASK Chemicals Group’s operations. If any questions arise regarding these policies or any other ethical, legal, or regulatory issues, every Employee is asked to consult a **local compliance manager** or the **Compliance team at headquarters** for guidance before taking any action. Everyone is asked to think before they act, to use good judgment and be honest and ethical in every action they take.

As a Senior Leadership Team’s member we take all reported concerns serious. We will at no time tolerate violations of this Code of Conduct or the applicable Laws and Regulations. Violations may result in **reprimand, claims for damages, or disciplinary actions**, which can even lead to **termination of employment**. We also reserve the right to report any such violations to appropriate law enforcement or regulatory authorities.

It does not matter for which group company we all work or what we do, we are all covered by this Code of Conduct and therefore bound by the principles. **We are responsible to live the values.** All Employees are accountable for ensuring the highest standards of ethical conduct when acting as members of ASK Chemicals Group.

ASK Chemicals Senior Leadership Team:

Frank Coenen
Chief Executive Officer

Hubi Windegger
Chief Financial Officer

Dr. Jens Müller
Executive Vice President Chemicals Division

Bob Gage
Executive Vice President North America

Rudi Nerinckx
Chief Human Resources Officer

Jörg Brotzki
Executive Vice President Materials Division

Almir Gozzi
Executive Vice President South America

Luiz Totti
Executive Vice President Asia

1. Our Principles

Our Code of Conduct reflects who we are and what's important to us. It provides an overview of the laws, regulations and company policies that apply to us and the work we do, but it does more than that. It builds upon our shared values. That's why we count on every Employee to follow our Code of Conduct and make decisions that will preserve the trust that others have placed in us. This Code of Conduct applies to all Employees of companies where ASK Chemicals GmbH directly or indirectly holds minimum 50 percent of the shares. We expect nothing less from our business partners, including our consultants, distributors, co-manufacturers and suppliers. We understand the responsibility we have to communicate with them about our high standards of integrity.

ASK Chemicals Group is globally active with legal entities in all major economies of the world. Our Employees represent ASK Chemicals Group wherever and whenever they meet other people. It is our resolute intent to always conduct ourselves compliant with all applicable laws, regulations, international principles, and ethical practices of each individual country as well as in conformity with our internal policies, standards and procedures (jointly referred to as the "**Laws and Regulations**").

We call upon and obligate all our Employees to conduct themselves in compliance with the Laws and Regulations.

The success and reputation of ASK Chemicals Group depend on the behavior of each of us.

This Code of Conduct defines the most important principles and rules to which ASK Chemicals Group adheres and with which all Employees must comply. This Code of Conduct is not, however, exhaustive. It is complemented by all ASK Chemicals Group's compliance documents and other internal policies and procedures. We expect our Employees to inform regularly about all internal regulations concerning their area of responsibility by accessing relevant information and attending offered training programs in compliance and other topics.

Everyone of us is encouraged to constantly strive for improving the sustainable and ethical impact on the environment, as well as to align and improve our Corporate Social Responsibility ("**CSR**") and Environmental, Social & Governance ("**ESG**") efforts. Both, CSR and ESG, are non-financial factors that help to identify material risks and growth opportunities.

We are aware of the fact that identifying the prevailing law is a most demanding task when operating in an international environment and that professional advice is often essential. We therefore consult our supervisors or the respective internal experts in all cases of doubt.

2. Human Rights & Labor

ASK Chemicals Group recognizes all applicable Laws and Regulations pertaining to human rights, human dignity and labor practices, and abides by them. Our key commitments include:

- **No forced labor:** any form of forced labor is prohibited, including forced prison labor, indentured labor, bonded labor, slave labor or human trafficking.
- **No child labor:** minimum working age requirements are followed in accordance with national laws and international agreements.
- **Work times:** ensure working hours and overtime work comply with applicable law and local sector-specific labor regulations.
- **Fair compensation:** all wages and social benefits are defined and agreed as prescribed by the local legislation and in accordance with industry practice and local markets conditions.
- **Non-discrimination and fairness:** equal opportunities and fair treatment towards our Employees and contractors, providing an inclusive, diverse and supportive working environment.
- **Freedom of association and collective bargaining:** Employees' rights to associate freely and bargain collectively are recognized.

3. Equal Treatment, Inclusion and Diversity

We are a growing group of companies operating within an international market and increasingly multicultural environment. We regard the diversity of our Employees, customers, and suppliers as a welcome enrichment. We treat all our colleagues and business partners with respect and open-mindedness.

All of us are aware of our responsibilities and our impact as role models. We are committed to treating each other with honesty and trust.

We oppose discrimination or disparagement on grounds of gender, race, ethnicity, religion, ideology, physical or mental disability, sexual or gender orientation, or age. Equally, we condemn all forms of sexual harassment.

4. Fair Competition Practices

ASK Chemicals Group competes fairly and within legal boundaries. We know that everyone benefits from a competitive marketplace, so we follow the antitrust and fair competition laws in all locations where we operate and avoid even the appearance of unfairly restricting another company's ability to compete against us.

Anti-competitive practices that are illegal include: price-fixing with competitors, agreements on market sharing or production capacities, and agreements to dictate or control a customer's resale price. Any kind of concerted action, informal talks or „Gentlemen's agreement“ that are intended to restrict competition, or may have the effect of doing so, are prohibited. We must avoid even the appearance of participating in any such action.

We, the Employees handle market information carefully. Trade association conferences, for example, provide the opportunity to meet with competitors and discuss matters of mutual interest. Sensitive business information such as customer relationships, prices, imminent price changes or

costs shall not be exchanged with competitors. If a discussion turns to a competitively sensitive subject, we stop the conversation, remove ourselves from the situation and report the incident immediately to the Global Head of Legal & Compliance.

In the case that a group company has a dominant market position, all Employees are asked to avoid any abuse of such positions to the detriment of other market participants. Dominant market positions are by no means illegal in themselves provided they accrue from our own achievements, our own intellectual property assets and rights or licensing agreements with third parties.

When a group company is bidding for a contract, any collusion with other possible bidders is strictly prohibited. We aim to win the business fairly. When our company issues a call for bids, we treat all bidders equally. We do not forward information as to the identity of a bidder or the amount of his or her bid to another bidder.

5. Business Relationships with third Parties

When we select a supplier we chose him only on the basis of price, quality, reliability, technological standard, product suitability, certification and the existence of a quality management system and complete an appropriate due diligence on the supplier. Under no circumstances shall personal relationships or interests be factors in awarding a contract. Advice or recommendations given by us to business partners of ASK Chemicals Group must not be motivated by our own advantages or relationships.

Our Supplier Code of Conduct defines the requirements to do business with any of our companies. We are fully com-

mitted to respecting human and labor rights and seek to promote their implementation throughout the value chain.

All ASK Chemicals Group companies verify that purchased products and services are consistent with ASK Chemicals Group's ethical, environmental and safety policies and with the applicable Laws and Regulations.

In view of the importance of appropriate due diligence on all business partners, ASK Chemicals Group implemented due diligence procedures which must be followed and completed prior to engaging with any business partner.

6. Corruption

In the conduct of commercial activities, gifts, dinner invitations or hospitality can be appropriate and common practice as a matter of courtesy and appreciation in many regions and countries of the world. However, the amount, frequency or type of contribution can be disproportional and may be considered as a bribery. This means that we do not directly or indirectly request, accept, offer or grant any advantage or anything of value by or to a business partner or a public official while we act on behalf of ASK Chemicals Group, especially in the context of the award or performance of a contract, unless we determine it is appropriate according to the guidance provided by the ASK Chemicals

Group's anti-corruption and anti-bribery guideline and our own good judgement. This applies to activities both at home and abroad.

The above applies even if the transaction with the partner concerned would have been agreed without such an advantage having been granted. Even the appearance of an irregularity must be avoided. Every Employee of our ASK Chemicals Group is responsible to share potential concerns with the local compliance manager or the Global Head of Legal & Compliance or through the integrity system of ASK Chemicals Group.

7. Quality, Safety, Health and Environmental Protection

We are committed to sustainable development, which is an integral part of our business practices. We attach equal weight to economic, ecological, and social concerns. All Employees share responsibility for quality, safety, health and environmental protection, as well as for ongoing improvements in these areas.

In general, no commercial usage of air, water, or soil may take place without a permit. In the vast majority of cases, the construction and operation of chemical production facilities also requires a permit.

Operating a facility without a permit, deliberately or recklessly exceeding the limits imposed on its operation under the terms of permit, or discharging substances into air, ground, surface waters, or groundwater without a permit is prohibited and can render you liable to disciplinary, administrative or criminal sanctions.

ASK Chemicals Group strives to minimize the consumption of resources (e.g. energy, water, raw materials) and residues. Waste must be disposed responsibly in accordance with local legal requirements. Similarly, ASK Chemicals Group is committed to emissions reduction for which it develops and improves innovative solutions.

Products are manufactured under agreed quality specifications and are legally compliant. Constant improvement and innovations help us to produce more efficiently and environmentally friendly. Similarly, our customers benefit from new and improved products.

Every Employee ensures safety in the transportation, loading and unloading, storage, or chemical conversion of raw materials and end products. In the event of an unintentional discharge or similar incident, we notify the company's departments responsible for environmental protection immediately so that action can be taken to limit the effects of the incidents.

All Employees are responsible to ensure safe handling of raw materials, products and waste in our manufacturing processes. Hazardous materials shall only be kept in appropriate correctly labeled containers, which must be stored in approved facilities. Unauthorized access shall be prevented. All rules, ordinances, permits and regulations must be observed when handling such materials. Prohibited materials shall not be manufactured or brought onto company premises.

8. Conflicts of Interest / Corporate Assets

We are all expected to act in the best interest of our company. This means we must never allow our personal interests or personal relationships to influence our actions on behalf of the company. Every decision we make while on the job must be objective and with the interest of ASK Chemicals Group in mind.

Employees shall immediately share their concerns with the local management or the Global Head of Legal & Compliance in the event of any irregularities.

Secondary jobs with or shareholdings (if the shareholding exceeds 5 %) of Employees in competitors, business partners and other companies with a business relationship with ASK Chemicals Group may lead to a conflict between private interests and the interests of ASK Chemicals Group. For this reason, you may not take on any secondary employment which may interfere with the interests of ASK Chemicals Group and has not been approved in advance

by your supervisor and the Human Resources department. The same applies to shareholdings, occasional side-hustles, freelance activities and setting up your own company.

This also applies if a family member (parents, siblings, children or spouse) holds such a share and is aware of this. In this case we are all responsible to report such a participation of a family member without disclosing personal data.

The assets of ASK Chemicals Group, which have been acquired over generations, are essential for the performance and success of our business. For this reason, we all have to ensure that these assets are handled responsibly and are protected in particular against loss, damage, waste and abuse. This includes data, programs, documents, or copies thereof, or office devices like laptops, printers, and mobile phones. Work materials and other site equipment (such as goods, vehicles, office supplies, documents, files, data storage media) may only be used for work related purposes.

9. Money Laundering

Money laundering is a process where funds generated through criminal activity – such as terrorism, drug dealing, tax evasion, human trafficking and fraud – are moved through legitimate businesses in order to hide their criminal origin. We are committed to conducting business in a way that prevents the use of our business transactions by those who might abuse them, so we comply with the applicable anti-money laundering, financial crime and antiterrorism laws in all countries where we operate.

We do not engage, either directly or through others, in money laundering or terrorism-related activities, or conduct business with any person or entity involved in money laundering or terrorism-related activities, even though those activities are not always obvious. Therefore, we are proactive when it comes to spotting financial transactions that might signal a problem, and diligently review their business partners.

In cases of doubt about the permissibility of financial transactions, we can consult the treasury department or the Global Head of Legal & Compliance to further assess the transaction.

10. Sanctions and Export Controls

Although markets are usually free and open, there are different foreign trade regulations that require authorizations for the import and export of certain ASK Chemicals Group's products and services or in particular cases even prohibit its supply. These restrictions may not only apply to a certain type of product or its intended use, but also to the country of origin or destination, or the customer itself. As ASK Chemicals Group participates in foreign trade, we comply with these trade control and sanction regulations.

To ensure that our products do not fall into the wrong hands and that ASK Chemicals Group will continue to be regarded as a reliable partner who complies with foreign

trade law, the legal feasibility of transactions must be assessed in advance by the responsible person on the basis of the applicable export control rules and regulations. In addition, before entering into a business, we must check and inquire whether any (potential) business partner is listed on any relevant sanctions list.

In view of the importance of compliance with the applicable export laws and regulations, ASK Chemicals Group issued specific guidance on export control and implemented sanctions screening tools.

11. Intellectual Property Rights

The results of our scientific research and technology development, reflected in the form of know-how and proprietary rights (e.g. utility and design patents, trademarks, and trade secrets), constitute valuable assets of great importance to ASK Chemicals Group.

Our scientific and technical Employees therefore prepare and document the results of their work in accordance with prevailing scientific standards and immediately communicate these to the Global Research and Development department. It is important that the actual inventors are named in the invention notice. The appropriation of inventions from other Employees – that are not the actual inventors – is not permitted and may result in severe personal consequences or the loss of proprietary rights.

All of us are obliged to keep the content of patent applications secret and confidential until publication. Furthermore, the knowledge on which the patent is based and any other relevant knowledge are to be treated as trade secrets. It is important that you take appropriate measures of security to protect ASK Chemicals Group's trade secrets.

All agreements with third parties which involve the transfer of patents or knowledge, or grant rights of use or licenses, shall be drawn up with the assistance of the Global Research and Development department where appropriate.

We respect the lawful proprietary rights of third parties and refrain from any unauthorized use of such rights. The legal position relating to existing third-party proprietary rights is to be carefully researched. This applies in particular in the case of developing and marketing products.

12. Documentation / Data Protection/ IT-Security / Confidentiality

Accurate recordkeeping and reporting help us to meet our legal and regulatory requirements. Maintaining financial integrity also reflects positively on our reputation and credibility. Each Employee is responsible for ensuring the accuracy of all business and financial records. All records and files are kept in such a way as to permit deputizing by a colleague at any time. Files must therefore be complete, orderly and readily understandable.

We keep non-public information such as business, financial, operational information related to ASK Chemicals Group or their business partners confidential and share such information only with those who have both the authorization to access it and a need to know the information in order to do their jobs. All of us are responsible to take appropriate steps (e.g. confidentiality agreements) to protect classified information against unauthorized access by third parties. No Employee may make copies of business papers or computer files other than for work-related purposes. Our commitment to protect non-public information also continues when one of us leaves ASK Chemicals Group.

ASK Chemicals Group is committed to keeping personal data of Employees and business partners confidential, in accordance with the applicable statutory data protection regulations and internal guidelines. For this purpose, ASK Chemicals Group implemented a global policy for data protection.

To protect personal data and company information from security breaches that, whether by accident or negligence, could result in destruction, loss, alteration, unauthorized disclosure or access (also called "personal data breaches"), ASK Chemicals Group took several internal measures. Should a personal data breach or any other IT security incident occur, we have to report it to the Global Head of IT or the IT-Team. Each Employee is responsible to prevent any damage from the company by the loss of data, which could result in huge fines to the company. The responsible departments will then take further steps also regarding any communication of the incident to external parties.

13. Reporting Misconduct, Enforcement, and Discipline

All Employees are responsible to share any concerns about potential misconduct or infringements of this Code of Conduct, the compliance documents or the applicable Laws and Regulations with his or her supervisor, the Global Head of Legal & Compliance, or through the integrity system of ASK Chemicals Group. If we, the Employees, are unsure whether a violation of ASK Chemicals Group compliance policies or this Code of Conduct may be occurring, we will seek further advice from one of the before mentioned contact persons.

ASK Chemicals Group companies have access to the service of their local compliance manager and headquarters Compliance Office, as well as to external lawyers, to address potential compliance issues. ASK Chemicals Group also offers its Employees protection in the event of unjustified actions by authorities.

A global integrity system (whistleblowing hotline), managed by an external, specialized third party company, is available to all Employees to report – also anonymously, if desired –

violations of this Code of Conduct, compliance documents or applicable Laws and Regulations or any form of misconduct by any Employee or third party. Reports are processed carefully by the Global Head of Legal & Compliance and treated confidentially.

Our supervisors are expected to be role models in all aspects of compliance. Every supervisor must organize his or her area of responsibility in such a way that reports of legal and policy violations can always reach him or her. Problems must be actively addressed.

To improve our Employees' understanding of this Code of Conduct's principles as well as their rights and responsibilities, ASK Chemicals Group has made available various compliance training programs, tools and resources. Training programs are repeated from time to time, and training manuals are updated periodically. The Compliance team offers training programs in specific areas regularly.

ASK Chemicals GmbH

Reisholzstraße 16 – 18
40721 Hilden, Deutschland
Phone: +49 211 71 103-0
info@ask-chemicals.com
www.ask-chemicals.com

General Counsel & Corporate Compliance Officer

Esther Zölzer, EMBA
Phone: +49 211 71 103-101
esther.zoelzer@ask-chemicals.com

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