

CODE OF CONDUCT

Our guiding principles



ZSCHIMMER & SCHWARZ

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Dr Felix Grimm (COO), Dr Christoph Riemer (CEO) and Frank Richter (CFO)

PREFACE

Since its founding in 1894, our company's success has always been based on three factors: economic efficiency, due consideration of ethical principles and due compliance with the applicable laws and regulations. In the future, we will continue to attach great importance to being a role model for our employees and our business partners in terms of corporate culture and success. Being part of the Global Compact network, we take responsibility and support the United Nations initiative for a more sustainable economy for the benefit of all people, communities and markets – today and in the future.

This brochure is intended as an explicit expression and guide for the exemplary behaviour of our employees, both internally and externally. Compliance with these rules is a duty and obligation for all. With these guidelines, we want to continue our long-standing corporate tradition and establish a common understanding of fairness, tolerance as well as social and economic responsibility.

[The Executive Board of the
Zschimmer & Schwarz Group](#)



1 HUMAN RIGHTS AND INTEGRITY

We respect the personal dignity, rights and privacy of every individual.

We expect all employees, customers and business partners to treat each other fairly and to respect their mutual rights and privacy.

Discriminatory treatment not based on factual and objective reasons – in particular because of sex, gender identity, race, disability, origin, religion or belief, age or sexual identity – must not occur.

Zschimmer & Schwarz does not tolerate sexual harassment at work or any related discrimination; nor is any form of bullying tolerated, such as rumour-mongering, threatening or humiliating behaviour, insults, defamatory or unworthy treatment.

2 COMPLIANCE WITH APPLICABLE LAW

Worldwide, we always observe the law, both as individuals and as a company.

We aspire to be a model company in every respect. Our responsibility is therefore to ensure compliance with all applicable laws and regulations, both nationally and internationally.

Executive personnel at Zschimmer & Schwarz lead by example. They are therefore required to know and abide by basic laws, regulations and internal rules. Every manager bears responsibility for the employees entrusted to them.

The Executive Board must ensure that employees comply with applicable rules and regulations. They are therefore required to carry out regular training programmes, to uphold monitoring and to be approachable.

The Code of Conduct sets a minimum standard. The specifics of the laws, policies and practices in other countries, business areas or markets may include stricter requirements and must be observed.

3 COLLUSION AND CARTEL LAW

We face up to fair competition with the breadth and quality of our products and services.

Therefore, all our employees are prohibited from discussing the following with competitors: pricing, production, capacity, distribution, profit, margins, tenders, costs, business relationships, competitive behaviour, contracting, distribution of customers, markets, areas and production programmes or other factors that determine or influence the competitive behaviour of companies in the market. Giving preference to certain customers and suppliers over others or excluding contractors is prohibited. Similarly, employees may not acquire competitive information through industrial espionage, bribery, theft or wiretapping.



4 GIFTS AND CONTRIBUTIONS, DONATIONS AND SPONSORING

We always act with integrity in all areas and do not tolerate dealings related to any form of corruption.

As a principle, gifts and gratuities should neither be bequeathed nor accepted: this applies to financial gifts in any currency and gifts in kind. Promotional gifts may only be accepted if they conform to customary practices and do not appear to convey dishonesty. Travel, free tickets to sporting and cultural events, invitations to meals, services, promotional bonuses and discounts are also considered gifts. If necessary, line managers should be informed and their judgement obtained.

Gifts and contributions to public officials are prohibited.

Donations and sponsorship measures must comply with legal requirements. When planning and deciding on donations and sponsoring measures, both the Corporate Communications department and the line manager must always be involved.

For further guidelines and details, employees should refer to the global compliance guideline and the individual company guidelines on the subject of anti-corruption.

5 PREVENTING MONEY LAUNDERING

We combat money laundering by abiding by applicable rules and only working with reputable partners.

Money laundering is understood as the channelling of illegal proceeds from organised crime into the legal financial and economic cycle while concealing its origin.

To counteract money laundering, we do not conduct any questionable financial transactions.

Payments for deliveries and services are made exclusively to the contracting party and, as a rule, in the country in which the contracting party has its registered office.

Cash payments are generally prohibited. If cash payments within socially acceptable dimensions should be necessary, duly signed receipts must be submitted. Additionally, the Legal Affairs & Compliance department (compliance@zschimmer-schwarz.com) must be informed immediately and, if possible, in advance of any payment transactions and/or agreements that deviate from this.



6 FOREIGN TRADE AND EXPORT CONTROL

We export our high-quality products worldwide, reliably and in accordance with foreign trade law.

To prevent our products from being misused for the propagation of acts of terrorism or war, we respect and support national and international export law regulations, embargoes, sanctions, prohibitions, licensing requirements and other restrictions imposed by trade control regulations.

For this purpose, we have an effective organisation with corresponding internal export processes and control systems, and we employ appropriate, highly qualified personnel.

7 INFORMATION SECURITY

We protect information from threats such as unauthorised access or manipulation by systematically ensuring its confidentiality, integrity and availability.

We achieve information security by means of numerous measures. These are part of a security concept and comprise technical as well as organisational measures.

7a DATA PROTECTION

We are committed to the conscientious protection and security of personal data.

We adhere to strict standards when processing the personal data of our employees and business partners. We use these only for the intended purposes and in accordance with applicable data protection laws.

We process a great deal of data in our daily business. In particular, personal and sensitive data may only be

collected, processed or transmitted in accordance with the legal guidelines and our own strict specifications.

In case of doubt, the Data Protection Officer or the Legal Affairs & Compliance department must be consulted (datenschutz@zschimmer-schwarz.com).

7b IT SECURITY

We keep digital risks controllable at all levels from emergence to occurrence.

As digitalisation progresses, data, computers, networks and data carriers are the focus of information security. We centrally control the appropriate measures, manage internal and external service providers involved, monitor the effectiveness and constantly align the maturity of all components with business risks. These strategies and measures enable us to sustainably protect our company and our customers from cyberattacks.

7c CONFIDENTIALITY

We keep confidential information secret.

As an innovative industrial company, we protect our innovations and all our intellectual property. We therefore restrict the disclosure of our confidential information to the bare requirements and exclusively to our business activities at Zschimmer & Schwarz. We conclude confidentiality agreements with third parties before disclosing any such information. Likewise, we handle the data of our contractual partners with equal care and confidentiality.



ENVIRONMENTAL PROTECTION, SAFETY AND HEALTH

We are aware of our responsibility to the environment and society and act in a responsible, sustainable and resource-conserving way.

As a traditional family business, we stake our reputation on conscious responsible action. One of our most important tasks is therefore compliance with all laws and regulations for the protection of people and the environment.

Safety is always the top priority for our company. We cooperate closely with the authorities and the trade association, and we make every effort to eliminate health risks for our employees and the people around us. We therefore employ state-of-the-art safety precautions. All of our employees are trained and assume responsibility for the protection of people and the environment.





9 PROTECTION OF COMPANY AND THIRD-PARTY PROPERTY

We treat company property and other company assets with great care. We protect and respect the property of others, in particular that of our business partners.

In our offices and working areas, the company's property is made available to the employees to carry out their work. The numerous facilities and other equipment (such as telephones, copiers, computers, software, internet) are used exclusively for work-related activities. Any private

use of these facilities and equipment must be previously approved or must be stipulated in internal codes of conduct. Every employee commits to handling company property and the property of others (e.g. customers, colleagues) responsibly and carefully.

10 CONFLICTS OF INTEREST

We avoid conflicts of interest.

We always act in the interests of our company. To uphold our reputation and to act with integrity, we keep our professional and private interests strictly separate. Our personal decisions must not conflict with our corporate interests or negatively impact them. Such conflicts of interest may

arise, for example, when taking part in competitions, in certain ancillary activities or in employment and business relationships with relatives and acquaintances. If you are unsure, ask your line manager or the Legal Affairs & Compliance department (compliance@zschimmer-schwarz.com).



YOUR CONTACTS FOR COMPLIANCE QUESTIONS

In case of questions regarding the Code of Conduct or uncertainties concerning appropriate conduct, employees can consult their line managers. If this is not possible or not desired by the employee, the staff of the Legal Affairs & Compliance department (compliance@zschimmer-schwarz.com) can provide support.

You can also report violations anonymously at any time via the whistleblower system in the "Compliance" section of our corporate website. The greatest possible discretion is assured.



Chemistry tailor-made



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