

## Introduction

The Bruno Bock Group, as the leading global expert in organic sulfur chemistry, is built on strong values.

### **OUR PURPOSE**

*is to improve people's quality of life.*

### **OUR VISION**

*is to be the preferred partner in sulfur chemistry worldwide by leveraging our expertise and the full intrinsic added value of sulfur chemistry into new technologies and applications.*

### **OUR MISSION**

*is to strive for innovation, enabling our clients to create the best, high performance solutions for their customers. Our motivated employees combined with our high quality, safety and environmental standards are the foundation for mutually beneficial partnerships.*

### **OUR PRINCIPLES are**

#### **Integrity**

Our individual and collective behavior shapes the opinions of everyone we deal with. Because of this we act in a fair and honest way, complying with all laws and regulations wherever we operate. We all contribute to safeguarding the company's integrity and reputation.

- *We compete in a fair and honest way*
- *We follow trade restrictions carefully*
- *We protect personal and confidential information*
- *We maintain a clear distinction between business and personal interests*
- *We look after company property and use it appropriately*
- *We keep records in accordance with company policies*
- *We are alert to fraud and report suspicious activity*
- *We communicate in a professional way*

#### **Sustainability**

For us, sustainability, environmental and climate protection and resource efficiency are key corporate objectives. When developing new products and services and when operating production equipment, we ensure that all environmental and climate impacts are kept to a minimum and our products make a positive contribution to environmental and climate protection for our customers. Every employee bears responsibility for conserving natural resources and helping protect the environment and climate through their individual behavior.

As a family owned business there is another important dimension of Sustainability: Our decision-making processes are based on long term horizons and span across generations.

#### **Technology**

With our individual knowledge and skills, we contribute to the overall success of the company. We do not insist on maintaining the status quo, but rather continually develop and qualify ourselves further for future tasks. We take responsibility for our own actions.

At the same time, we invest heavily in research and development. The outcome of these activities is highly valuable to us. We look after and protect our valuable assets. After all, we want our products and services to succeed in the market.

We want to work with external business partners who are equally supportive of fair competition and act accordingly.

## **Code of Conduct**

### **Human Rights, Labor and Social Standards**

The Bruno Bock Group is particularly committed to the abolition of all forms of child and forced labor, the principle of non-discrimination, the recognition of the freedom to associate, collective bargaining and social partnership, fair compensation and, entitlement to adequate working hours and paid leave as well as maintaining proportionality in disciplinary measures and security.

We do not tolerate child labor in our supply chain. Suppliers should avoid any sort of child labor in their business operations consistent with the International Labor Organization standards and the United Nations Global Compact principles.

We respect individual rights to freedom of opinion and association, and we recognize the right to collective bargaining, the right of all employees to form unions and employee representative bodies on a democratic basis within the framework of national legislation. For Bruno Bock trusting and close cooperation with employee representatives is a key component and established cornerstone of corporate policy. Mutual trust and cooperative relations are based on an open and constructive dialogue characterized by mutual respect.

Pay and other benefits comply with the respective national standards and the standards in the national economic sectors, industries and regions. We ensure that working hours and remuneration comply with laws and are fair and just.

### **Equal treatment and non-discrimination**

A culture of equal opportunities and mutual trust and respect is of great importance to us. We promote equal opportunities and prevent discrimination in the recruitment, promotion, training and development of employees. We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religion or world view.

Our culture is characterized by our openness and our ability to learn from one another. We treat one another with respect. This enables us to identify common ground, recognize the contributions of colleagues from other cultures, and cooperate constructively.

We do not tolerate any language or conduct that encourages an offensive or hostile working environment. We work together respectfully to create a climate of acceptance and mutual trust. We recruit, hire, train, and promote our employees based on this principle.

### **Protection of Environment, Health and Safety**

We never compromise on safety. Economic considerations do not take priority over safety, health and environmental protection. Occupational safety and health protection are an integral part of all business processes and are included from the outset in all technical, economic and social considerations.

We work together to ensure a safe workplace and are keenly aware of potential hazards.

We understand that our applicable safety guidelines serve to protect us and therefore we follow them conscientiously. We accept local regulations as the minimum standard. If our global safety standards specify stricter requirements, then we meet the higher standards.

The same safety standards as for the Bruno Bock Group employees shall apply to employees of subcontractors. This is considered in selecting and working with subcontractors.

The Bruno Bock Group bears responsibly with natural resources and protects the environment in our area of work. We are committed to comply with all environmental laws and regulations in every country we operate in. We focus on reducing our environmental footprint by lowering our carbon emissions, using less energy and creating less waste in our activities. We develop environmentally friendly technologies and work closely with our business partners to do more with less in an environmentally responsible way.

The Bruno Bock Group is committed to climate protection. Consequently, we will establish and maintain greenhouse gas controlling in the form of a carbon footprint and greenhouse gas management.

In addition, we strive to reduce greenhouse gas emissions sustainably and continuously, taking into account the applicable laws and regulations. This is accomplished by adhering to climate protection targets set by our management and the major stakeholders. The basis of the target definition is the emission data from the past as well as the economic efficiency of the measure.

We are committed to determining and fulfilling all energy-legal and other requirements respective energy use, energy efficiency and energy consumption.

The implementation of the corporate climate protection policy is carried out by:

- Implementation of a suitable system in connection with an energy management system
- Implementation of a responsible body for climate protection (Energy Management within the Group QHSE organisation)
- Regular recording, review and communication of key climate protection aspects
- Regular recording and updating of greenhouse gas data
- Permanent review, evaluation and continuous improvement of processes and activities for their climate protection efficiency.
- Planning and introduction of greenhouse gas reduction measures
- Regular recording, analysis and evaluation of the results of the measures
- Providing necessary resources and information by the management to achieve the targets

All responsible employees and service providers shall be involved in implementing the company's climate protection policy. Employees are adequately informed and involved in the climate protection program.

Waste must be disposed of in accordance with legal requirements. If the services of third parties are used for this purpose, it must be ensured that they, too, comply with environmental regulations and our corporate standards.

Global processes, highly specialized products, a wide range of raw materials, production facilities, and transport processes are just a few examples that illustrate our demand for energy and natural resources. We are aware of this. This is why we use resources such as energy, water, and raw materials as efficiently as we can.

We consider creative solutions and improve our procedures with the objective of protecting resources or recycling.

## **Corruption, Gifts and Entertainment**

The Bruno Bock Group stands for fair competition, in which the supplier with the best products and services prevails. Accordingly, we reject all forms of corruption or attempts to gain improper influence.

We make no financial contributions, in particular donations or sponsorships, to political parties in our home country or abroad, organizations related or similar to political parties, individual office incumbents or candidates for political offices.

If inappropriate benefits are requested from us in order to win a contract, we take action against them. We ensure that we are awarded contracts based on our performance. We therefore decline inappropriate advantages from external business partners or other external third parties that are intended to influence us or could do so.

The Bruno Bock Group is strictly committed to fighting any kind of corruption. This means that if a possible case of corruption comes to our attention, we don't turn a blind eye. Instead, we report it so that the incident can be investigated by our responsible staff members.

Consequently, gifts, business meals or entertainment are to be given or accepted only if intended or understood as simple business courtesies which are consistent with customary business practices and which from the outset rule out any influence on a business decision or an official decree. If inappropriate gifts cannot be tactfully refused, they should be accepted. In that case, the manager must be informed thereof and shall decide on the further treatment. When we accept gifts and invitations, we only accept them openly. This means that anyone may know about the gifts and invitations we have accepted. Our business partners, customers, shareholders, employees, and the public place their trust in our integrity.

### **Antitrust laws and trade control**

Competition means convincing customers with ideas, innovations, and high-quality products, and gaining traction on the market as a result. That is fair competition. And that is exactly what the Bruno Bock Group promotes in all the countries in which we operate.

Agreements and concerted practices between competitors are prohibited if their objective or effect is to prevent or restrict competition. We expressly decline unlawful agreements with other market players.

We maintain a policy of strict compliance with competition laws and our own rules. We do not enter into agreements and practices that would have a detrimental effect on competition, such as price-fixing, market allocation or abuse of dominant position. We promote our products in a fair and balanced way, with information that has been approved through our internal marketing review procedures.

Any direct or indirect exchange of information between competitors (which can include non-exclusive distributors) is prohibited, such as information on customers, pricing, costs, salaries, terms of sale, methods of distribution, market shares, production volumes, bidding or strategies (business and research strategies, for example).

We conduct international business in a world that has trade restrictions. Some countries have trade controls that restrict certain business transactions and movement of goods across borders. We comply with all trade controls applicable to our business, and provide accurate and truthful information about our business to customs and other relevant authorities

### **Money laundering**

Money laundering means the introduction of assets (not only cash) originating from criminal offences into the regular financial and economic cycle.

The Bruno Bock Group fulfils its legal obligations to prevent money laundering and does not participate in money laundering activities. In cases of doubt, all employees are required to report unusual financial transactions, especially those involving cash, which could give grounds to suspect money laundering, to the responsible finance, legal or compliance department for review.

### **Protection of data privacy**

We are committed to protecting the personal data of employees, customers and business partners. We follow applicable laws which ensure that we treat personal data with a high level of care. We abide by these rules to ensure that we keep personal data for legitimate business purposes, and that we are clear about when and how we collect, use or share personal data.

In our digitized world, data can be collected, shared, and evaluated or used quickly and easily. It is therefore especially important that in our personal actions we take care to handle personal data responsibly.

We protect the data entrusted to us by handling it properly, using it only for the intended and authorized purposes, and considering the full rights of the data owner at all times.

Wherever possible, we obtain personal data directly from the relevant individual and maintain transparency about its usage. We protect the data from possible abuse by observing the prescribed safety precautions.

We are particularly respectful of highly sensitive information, such as data regarding health or religion.

## **Animal Welfare**

The Bruno Bock Group does not conduct testing of its products on animals in the context of cosmetics legislations.

However, toxicological data requiring animal testing is still needed under many pieces of global legislation requirements to ensure the protection of human health and the environment. This is for example the case under the European REACH Regulation EC No 1907/2006 for chemical substances.

Animal testing will be minimized, and alternatives will be used whenever possible, scientifically valid and acceptable to regulators.

## **Conflict Minerals**

The Bruno Bock Group ensures that our products do not contain metals derived from minerals or their derivatives originating from conflict regions that directly or indirectly finance or benefit armed groups.

In addition, the Bruno Bock Group is taking and will perform due diligence within our supply chain to assure that Conflict Minerals or the related metals such as gold, cobalt, tungsten, tin or tantalum are not sourced from mines in conflict areas of the Democratic Republic of Congo (DRC), or illegally taxed on trade routes, which are controlled by non-governmental military groups. Trade routes not confirmed to be "Conflict free"; include direct exports from the DRC, as well as exports through Rwanda, Uganda, Burundi, Tanzania and Kenya (countries which are global export routes for DRC-mined minerals according to the U. N. Security Council).