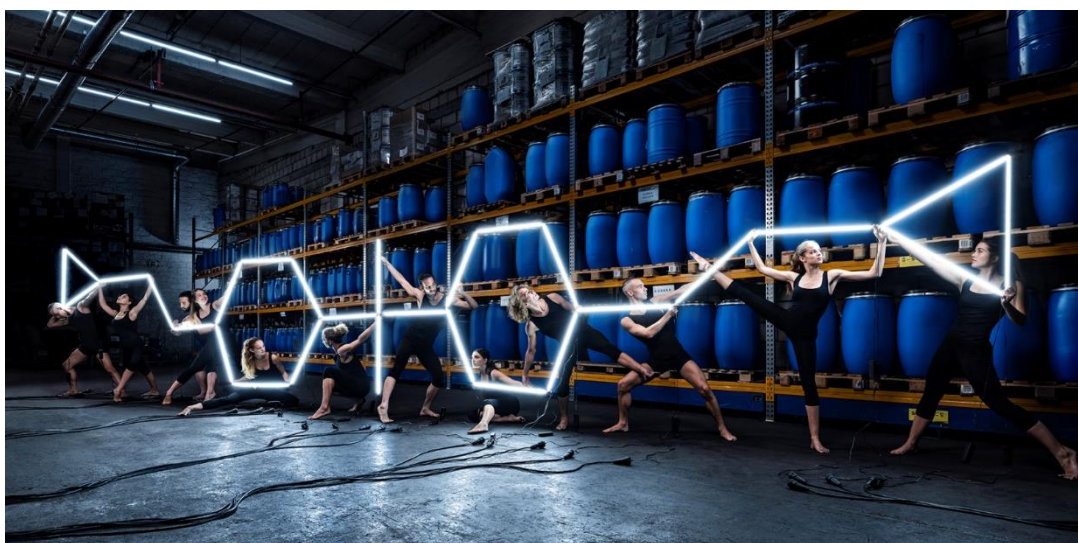


General Code of Conduct



Bodo Möller Chemie Group

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1. General information

We, the management of Bodo Möller Chemie GmbH (BMC), undertake to comply with all applicable laws and regulations.

We undertake to comply with the following values and to implement them. BMC expects this of all employees, suppliers, principals / partners.

With a view to successful implementation and compliance, this "General Code of Conduct" is communicated to all employees, suppliers, principals / partners.

Where stricter regulations are required within a department or by the customer, then these stricter regulations must be followed.

2. Respect for human rights

As an international company, BMC commits to respect human rights.

a) Equal treatment, anti-discrimination and harassment

We are committed to having a non-discriminatory work environment and non-discriminatory dealings. We decisively confront unequal treatment of any kind (discrimination and prejudice); this applies in particular with regard to

- gender,
- race,
- origin,
- affiliation,
- faith,
- political or other opinions,
- language,
- birth,
- assets,
- disability
- and any other status which acts as a distinguishing feature.

Violations of behavioral requirements, legal provisions, internal guidelines and regulations can have serious consequences not only for the individual personally, but also for Bodo Möller Chemie GmbH.

For this reason, reprehensible, deliberate misconduct will not be tolerated, such as sexism and sexual harassment in particular within the meaning of the General Equal Opportunities Act (AGG) in Section 2 Paragraph 1 Numbers 1 to 4.

BMC supports the UN Convention on the Elimination of All Forms of Discrimination against Women.

b) Child labour and younger employees

Children need special protection. Under the UN Convention on the Rights of the Child, they also have a right to health, education, play and recreation time. We adhere to this convention and we argue against child labour as matter of course. We expect this as well from all our customers, suppliers and partners.

We employ minors only from the age of 15 years. We support the legal employment of young minors from the age of 15 years for training purposes, under training contracts. In this respect, we adhere to special employment provisions, such as the ban on working at night. Young employees are not engaged in any dangerous work, or work which damages their health.

c) Protection against forced or bonded labour and harassment

It is only motivation to work of one's own free will that brings about inspiration in the long term to perform at the highest level.

We commit ourselves to work which is purely performed at one's own free will. We do not tolerate forced labour and bonded labour. All of our employees are free to decide whether or not to work at BMC or to leave BMC. Our employees are also free to decide on the type and location of their private leisure activities.

BMC is not involved in, nor does it support, violence, physical or psychological punishment, humiliating or degrading treatment or threats.

3. Appreciative relationships

We strive for appreciative relationships with our employees, customers, and partners / principals. All relationships have the goal of mutual benefit: a win-win situation, in order to enable a long-term relationship. We factor in the interests and requirements of all parties and look for the best possible solution.

Together we can create something great. We encourage and support each other.

4. Fair working conditions

BMC believes in fair wages and salaries, and at least to the level of the statutory wage. Payment is made automatically and on time. The restriction of and dealing with the matter of overtime is legally and/or contractually regulated.

We comply with national legal regulations on working time restrictions. All employees have the right to regulated working hours and breaks.

Since we want to ensure that our employees are satisfied, we allow the formation of works councils and work together with them. The membership of a trade union is available to our employees.

5. Quality

We want to provide high-quality services, in order to have satisfied customers and stakeholders. The satisfaction of our customers and stakeholders is key, as are long-term relationships.

Therefore we perform quality-assurance measures for all relevant processes. In order to assure and promote quality, we have established an integrated management system, and strive for constant improvement.

6. Protection of the environment

An intact environment is our greatest asset. Therefore, we treat it with care.

We must prevent the pollution of the air, water and soil as far as possible. We also consider issues around noise protection, advocate the careful consumption of resources, and reduce energy consumption.

We ensure proper waste disposal and participate in recycling systems. However, waste prevention is the priority.

If possible, we choose the alternative which has the least negative impacts on human health and the environment.

Because we strive to continuously improve the environmental protection, we have established an integrated management system, which also includes the protection of the environment. We also participate in the "Responsible care in the chemical industry" programme, which sets more stringent requirements than the majority of national laws.

Objectives, along with the assessment of environmental risks, form optimal application advice in order to avoid the use of questionable substances.

7. Occupational health and safety

Our motivated and healthy employees form the engine-room of the company. Without them, we would not be efficient.

Therefore we also live the [integrated management system concerning](#) health and safety at work. We are committed to the preservation and promotion of health by providing a healthy working environment. We evaluate potential hazards and take precautions. We train our employees on how to work safely and on how to proceed in the event of accidents.

We provide a clean, ergonomic and safe working environment, fulfil all requirements of modern chemistry and of current safety regulations.

Our occupational health and safety concept also includes a strict ban on alcohol and drugs at BMC.

We strive to continuously improve occupational health and safety, and therefore participate in the "Responsible care in the chemical industry" programme, which sets more stringent requirements than the majority of national laws.

8. Anti-corruption policy

Our business relations are carried out in an exclusively transparent manner and with integrity. We [accept and adhere to national and international anti-bribery rules / laws](#) and prohibit any form of corruption, receipt or offering of bribes, fraud or deception. We expect this both of ourselves and of our business partners, and deal only with organisations / individuals who likewise adhere to these values.

BMC has established an anti-bribery management system (ABMS) as well as "rules for dealing with donations", in order to avoid bribery, to report any bribery and thus to deal with it in a uniform manner. We take action against violations in this respect.

Our employees are encouraged to avoid situations from which a potential conflict of interest may arise. In the event of an actual or potential conflict of interest arising, the Anti-Bribery Officer must be informed; the ABO will bring about a solution to the problem. This also applies to conflicts between personal interests or those [the spouse](#), close relatives, friends or business partners.

Our employees may neither set prices with their competitors nor discuss offers with them. They are also prohibited from providing competitors with any information on previous, current or future prices. We do not participate in cartels.

In order to monitor the ABMS, BMC has deployed an independent Anti-Bribery Officer, who serves as the point of contact on the subject, both internally and externally.

BMC encourages anyone with knowledge or reasonable suspicion of corrupt behaviour to contact BMC's Anti-Bribery Officer. People need not fear reprisals should they report corruption: such reprisals are not allowed.

9. Protection of information

We are committed to the concept of loyalty.

This applies in particular to the handling of confidential information.

a) Confidential and proprietary information

Our staff must properly treat sensitive information, including [confidential, personal and/or proprietary data](#). Information may only be used for the purpose for which it is submitted, and not for other purposes (e.g., advertising, public relations and the like), unless the owner of the information has given prior consent.

b) Information security

Our staff must protect confidential and proprietary information of others – including personal information – from unauthorised access, damage, use, modification and/or redistribution, through appropriate physical and electronic safety facilities. It must be ensured that the information / data is not passed on to other colleagues or third parties.

As soon as protected information such as personal data is no longer needed, it must be deleted.

c) Intellectual property

We observe all laws on intellectual property rights, including protection against disclosure, as well as patents, copyrights and trademarks.

Corporate property and third-party property is dealt with with great care.

10. Continuous improvement

We always strive to improve. This also applies to adherence to our values.

Any person who becomes aware of a violation of these BMC values with regard to customers, employees, suppliers, or any other person or organisation, is required by BMC to report this violation to the latter. Anyone reporting a violation will not be discriminated against.

BMC shall look for a solution to improve compliance with the values. BMC does not seek relationships with organisations or individuals who do not comply with our values. As necessary, BMC will suspend such a relationship and look for alternatives.