

Compliance Code of Conduct of the LEHVOSS Group

1. The LEHVOSS Group

Lehmann&Voss&Co. and its subsidiaries (LEHVOSS Group) offer a wide range of chemical and mineral specialities by flexibly combining the three procurement channels distribution, trade and production. We are a trusted partner for our customers, offering high technological solution competence, personal advice and individual services.

As a family business, we think and plan for the long term. Everyone is responsible for ensuring that this is reflected in our daily activities.

For all business activities and decisions, we undertake to comply with the applicable laws and other relevant regulations in the countries in which we operate. Business partners are treated fairly. Contracts are complied with, taking into account changes in the framework conditions.

We are committed to complying with the **Ten Principles of the UN Global Compact**. (Annex)

The basis of our actions are the values listed in "[Our values and our mission statement](#)".

The following Code of Conduct of the LEHVOSS Group illustrates these principles in detail. The aim is to prevent situations that could cast doubt on the fairness of our conduct and confidence in our services.

2. Confidence through fair and legally compliant business conduct - a personal challenge and the result of combined efforts

We can only continue to achieve these goals if everyone involved plays their part. The Code of Conduct therefore codifies requirements that are binding for all employees.

All employees must observe all laws and regulatory requirements applicable in their work environment as well as internal instructions and policies.

All employees are required to act honestly and fairly in their work environment and to avoid any conflict between the private and business interests of the LEHVOSS Group or the interests of our customers.

All employees are expressly encouraged to contact the Legal department or their supervisor if they find that someone is not behaving in accordance with the rules. This can prevent small problems from becoming big ones. No employee reporting such violations in good faith need fear disadvantages, even if the report turns out to be unfounded. Reports may also be submitted anonymously.

Managers serve as role models. They are responsible for their own behaviour and the behaviour of the employees in their area of responsibility, as well as for the proper compliance with all procedures designated to avoid reputational and legal risks.

3. Respectful interaction with one another - Non-discrimination principle - Development according to performance and potential

Our success is also essentially based on the respectful interaction with one another. We are willing to learn from mistakes and value open communication. The key criteria for employee development are performance and potential.

The LEHVOSS Group does not tolerate any discrimination or harassment at work, whether due to age, disability, origin, gender, political views or trade union affiliation, race, religion or sexual orientation.

4. Protection of personal data and requests for confidential information from authorities

We strictly adhere to the rules governing the protection of personal data.

Confidential information and documents relating to customers, the LEHVOSS Group or employees must be protected in a suitable manner against access by third parties as well as uninvolved colleagues.

Personal data may only be collected, processed and used insofar as necessary for specified, explicit and lawful purposes. The use of data must be transparent for the data subjects. Their rights of information and rectification and, if applicable, objection, blocking and deletion must be upheld.

In the case of technical security against unauthorised access to data and information, an appropriate standard that corresponds to the state of the art must be adhered to.

The LEHVOSS Group cooperates with all relevant public bodies and supervisory authorities. Any communication in this regard may only be conducted via the employees appointed for this purpose.

5. Communication with customers, business partners and the public

All announcements and reports by the LEHVOSS Group, whether to business partners, customers or the public, must be complete, fair, accurate, timely, and understandable .

This applies in particular to information and advertising material about our products.

Information to business partners, customers or the public about the LEHVOSS Group, our products, our customers or business partners may only be provided by employees authorised to do so.

6. Social networks

Anyone commenting in a public discussion or social networking on topics that affect the LEHVOSS Group or our business partners must make it clear that they are acting as private individuals and bear in mind the interests of the LEHVOSS Group and the business partners.

Please note that comments in e-mails or social networks can be informal and spontaneous, but that they will be stored by and accessible to the recipient or the internet users for a long time.

7. No conflicts of interest with customers and business partners

The LEHVOSS Group seeks sustainable, mutually beneficial business relationships with its customers and business partners.

Each employee must therefore ensure that the interests of our customers are taken into account fairly. Interests of customers or business partners must not be prioritised to the detriment of other customers or business partners.

8. Customer complaints

Customer complaints provide valuable information on potential for improving our business and, when properly handled, provide an opportunity to strengthen or revive customer relationships.

The LEHVOSS Group ensures that all significant customer complaints are dealt with promptly and comprehensibly.

9. Personal conflicts of interests

If employees experience conflicts between their personal interests and the professional responsibilities or interests of the LEHVOSS Group or our customers, this may damage the reputation of these employees and the LEHVOSS Group as a whole.

Employees should therefore avoid such situations both in their own interest and that of the LEHVOSS Group. Specifically:

- No sideline jobs that encroach on the contractual obligations or the competitive interests of the LEHVOSS Group. Sideline jobs must be reported in advance to the supervisor and the personnel department. Honorary posts on a temporary basis need not be reported.
- No financial interests in companies that may be affected by professional decisions of the employee or the LEHVOSS Group (except listed stock corporations).
- Any orders placed with relatives, life partners or other related parties of employees must be reported in advance to the supervisor and the Legal department, if known. This also applies to transactions with companies in which relatives hold an interest either directly or indirectly.
- If possible, no direct reporting lines between children, parents, spouses or life partners.
- No assumption of managerial posts (e.g. board member, managing director, board of directors, supervisory board, advisory board) at customers, business partners or competitors without the prior consent of the management following notification of the Legal department.

In case of doubt, please consult the Legal department. How the relationships are perceived by third parties is decisive. Even the semblance of a personal conflict of interest is harmful.

10. Gifts, business lunches and events

Gifts, business lunches, and information, image, or entertainment events can be a legitimate way to establish and support business relationships. However, they must never be used to gain unfair commercial advantages and offered to an extent or in a manner that could cast doubt on the professional autonomy and judgement of those involved.

Employees can protect themselves against misunderstandings by observing the following ground rules:

- No reservations about reasonable outlays for business-related hospitality events and dinner invitations (guideline: no more than EUR 150 per person).
- No reservations about Give Aways.
- Basically no reservations about gifts worth up to EUR 40 (guideline)
 - unless shortly before conclusion of contracts or negotiations,
 - to the home address or in any other non-transparent way.
- Never give cash or substitute money, such as cheques, gift vouchers.
- Invitations for representational purposes or with a predominantly or partial entertainment component only,
 - if considered customary and appropriate,
 - if representatives of the host are present,
 - participation is not repeated frequently and
 - the travel and accommodation costs are not borne by the inviting business partner.
- In case of doubt, please consult the Legal department.

Particular caution is required in the case of public officials. Here, the rules of the respective employer concerning gifts and invitations are to be observed.

11. Donations and sponsorship

The management decides on donations and sponsoring. They must not be used to gain indirect unfair advantages from business partners.

12. No tolerance of corruption, special caution to be applied with public officials

Our success in the market is based on performance, flexibility and service and must not be obtained by granting unfair benefits. Our business partners trust in the professional judgement of our employees.

The LEHVOSS Group therefore does not tolerate any form of bribery or corruption, acceptance or granting of undue advantages.

Anyone who fails to observe the rules governing gifts and invitations in section 10, runs the risk of being prosecuted for corruption. Even the promise or demand of unfair advantages can be punishable.

Invitations and donations to public officials must always comply with their internal rules governing gifts and invitations. The granting of benefits to public officials can be punishable as the acceptance or granting of undue advantages simply because it takes place with regard to the official position. It is not necessary that the exercise of their duty be unfairly influenced. Any person appointed to perform public functions may be regarded as a public official, not just civil servants and public-sector employees.

13. Prevention of money laundering and terrorist financing

The LEHVOSS Group has established risk-adequate precautions to prevent money laundering and the financing of international terrorism and export controls, in accordance with regulatory requirements and the requirements of the supervisory authorities. These must be observed.

14. Protection of competition

The LEHVOSS Group does not engage in illegal restrictive agreements and practices, in particular agreements with competitors on prices, terms and market sharing. Before employees derogate from procedures provided for in standard contracts or cooperation agreements, they must clarify with the Legal department that there are no inadmissible implications under competition law.

In the case of contacts with competitors and business partners, employees of the LEHVOSS Group do not discuss internal affairs, such as prices and conditions of sale or financing, costs, market overviews, organisational processes or other confidential information from which competitors or business partners could gain competitive advantages, without previously consulting the Legal department.

15. Protection of LEHVOSS Group assets and protection of natural resources

Technical industrial secrets and commercial trade secrets are important LEHVOSS Group resources. Every employee is therefore obliged to protect them. This includes strict adherence to the information security regulations of the LEHVOSS Group.

The LEHVOSS Group's assets and facilities, business records and working materials may not be misused for private purposes or given to third parties if this might impair the interests of the LEHVOSS Group.

Employees should strive to protect natural resources and ensure that the LEHVOSS Group's business activities minimise the impact on the environment through material savings, energy-efficient planning, and the reduction and recycling of waste. When selecting suppliers, advertising materials or other external services, every employee should consider environmental and social criteria in addition to economic aspects.

16. Occupational safety

Processes, facilities and equipment must comply with the applicable statutory and internal regulations on occupational safety and health, fire and environmental protection.

17. Consequences of infringements

Violations of these rules can result in significant reputational losses and legal disadvantages for the employees concerned, their colleagues and the LEHVOSS Group, including fines, criminal proceedings or restrictions on official permits. In addition, violations may result in labour law sanctions by the LEHVOSS Group.

Signature of the Executive Management Board (Knut Breede, Dr. Thomas Oehmichen, Soenke Thomsen)

ANNEX**THE TEN PRINCIPLES OF THE GLOBAL COMPACT**

1. Businesses should support and respect the protection of internationally proclaimed human rights.
2. Businesses should make sure that they are not complicit in human rights abuses.
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Businesses should uphold the elimination of all forms of forced and compulsory labour.
5. Businesses should uphold the effective abolition of child labour.
6. Businesses should uphold the elimination of discrimination in respect of employment and occupation.
7. Businesses should support a precautionary approach to environmental challenges.
8. Businesses should undertake initiatives to promote greater environmental responsibility.
9. Businesses should encourage the development and diffusion of environmentally-friendly technologies.
10. Businesses should work against corruption in all its forms, including extortion and bribery.