



CODE OF CONDUCT FOR SUPPLIERS

Harmony in Chemistry is not just a slogan. For Kluthe, it is both a compass and a recipe for success: the umbrella for strong values that we base our daily work on. We take great care that our products are developed and produced sustainably. We face up to our social responsibility and our responsibility for the environment.

We want to work with our suppliers and partners on a long-term and sustainable basis in order to further develop their sustainability performance in our supply chain. We expect our suppliers to fully comply with the applicable laws and to comply with the internationally recognized environmental, social and corporate governance standards (ESG-Standards). This includes, in particular, the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (Lieferkettensorgfaltspflichtengesetz; LkSG). We require our suppliers to comply with this Code of Conduct and to pass it on to their respective upstream suppliers (indirect suppliers of the company) as well as to ensure compliance with these provisions throughout our supply chain.

We particularly expect from our partners and suppliers to support, embrace and enact the following ESG standards, which are based on the ten principles of the United Nations Global Compact initiative, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization, Declaration on Fundamental Principles and Rights at Work, and the global chemical industry's Responsible Care® program:

ENVIRONMENT

- You comply with all applicable environmental, health and safety regulations.
- You promote the safe and environmentally sound development, manufacturing, transport, use and disposal of your products.
- You ensure by using appropriate management systems that product quality and safety meet the applicable requirements.
- You protect your employees' and neighbors' life and health, as well as the general public at large against hazards inherent in your processes and products.
- You are committed to the responsible handling of chemicals and hazardous substances, including their proper disposal. Chemicals that are hazardous to the environment are listed, monitored and, where possible, substituted with more environmentally friendly alternatives.
- You use resources efficiently, employ energy-efficient and environmentally friendly technologies, strive to use renewable energy sources, and reduce your waste volumes as well as emissions to air, water, and soil. This also includes reducing noise emissions and water consumption. Furthermore, you continuously try to close loops, recycle and reuse used raw materials and products.
- You reduce the impact of your operations on biodiversity, climate change and water scarcity and observe the principles of animal welfare. For this purpose, you aim to establish a system for recording and minimizing CO₂ emissions in accordance with the Greenhouse Gas Protocol, if you have not already done so. In the long term, you aim to decarbonize or defossilize your business model.
- You are committed to working with us to reduce the impact of our business practices on climate change. Where possible, you provide product carbon footprints of the products you supply to us as part of our Supplier Engagement Program. If these are not yet available, you will strive to establish a system for determining this data so that CO₂ data can be supplied to us in the future.

SOCIAL

- You support the protection of internationally proclaimed human rights, fight forced labor (including modern slavery and human trafficking) and child labor.
- You uphold the freedom of association and the right to collective bargaining in accordance with applicable laws.
- You treat your employees with respect and provide a workplace free of harassment or abuse of any kind, harsh and inhumane treatment, unlawful practices or discrimination.
- You enable your employees and other stakeholders to report concerns or potentially unlawful practices at the workplace.
- You treat all employees equally, regardless of ethnic or national origin, color, gender, sexual orientation, religion, creed, disability, age, political orientation, pregnancy or immigration status. We do not tolerate any form of harassment or discrimination in hiring and employment practices such as recruitment, application, promotion, staffing, training, wages, benefits and termination.
- You ensure equal opportunities for women and men in all aspects of education, personal and professional development, and grant women equal rights with men.
- You value a variety of identities, backgrounds of experience and perspectives and stand for diversity and inclusion.
- You respect land, forest and water rights as well as the rights of minorities and indigenous peoples in the countries and regions of origin in terms of sustainable procurement.
- You shall not use private or public security forces if the prohibition of torture and cruel, inhuman or degrading treatment is violated, life or limb is injured or freedom of association and freedom of association are affected.
- You comply with minimum wages and working hours in accordance with local laws, and ensure compensation of a living wage according to local living conditions.

GOVERNANCE

- You abide by all applicable national and international trade laws and regulations including but not limited to antitrust, trade controls, and sanction regimes.
 - You consider business integrity as the basis of business relationships.
 - You prohibit all types of bribery, corruption and money laundering.
- Conflicts of interest of any kind, such as kinship, affinity or partnership, are disclosed immediately and solved if possible.
- You respect intellectual property rights: plagiarism is disregarded and legally prosecuted as soon as it is detected.
 - You forbid gifts to private or public officials that aim to influence business decisions or otherwise encourage them to act contrary to their obligations.
 - You are aware of your financial responsibilities. All your business transactions can be transparently traced and are accurately reflected in financial disclosures and accounting. Necessary documents are provided to the authorities in a complete, adequate, accurate, timely and understandable. Any irregularity is to be reported immediately.
 - You respect the privacy and confidential information of all your employees and business partners as well as protect data and intellectual property from misuse. You do not disclose information that is not known to the public.
 - You implement an appropriate Compliance Management System, which facilitates compliance with applicable laws, regulations, and standards.

Ensuring the principles of sustainable development in our supply chain is important to us. You may acknowledge the principles stated above or demonstrate your commitment via compliance with your own code of conduct or company policies that embrace these standards. Kluthe reserves the right to conduct audits or evaluations to ensure that you are complying with laws, rules and standards and will take appropriate action regarding the business relationship if there is cause for concern. Kluthe reserves the right to discontinue any relationship for non-adherence to international principles, failure to correct violations, or displaying patterns of non-compliance with these standards. Should Kluthe incur damages as a result of your failure to comply with the foregoing obligations, we reserve the right to require you to compensate us for all damages and expenses incurred in connection with this.

Should you have any concerns about illegal or improper conduct, please contact Kluthe via email: compliance@kluthe.com.

You also have the option of submitting information about violations anonymously via our whistleblower system, providing contact details. You can find the whistleblower system on our homepage www.kluthe.com.

Suppliers and partners are part of the supply chain of our products.

Heidelberg, 22/08/2023