

Code of Conduct

Code of Conduct for ethical behaviour at our company

+ We stand for strong connections

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1 Introduction

STOCKMEIER has grown into a global company over the years. This has led us to come into contact with a wide variety of values throughout our working day. For this reason, it is important that we clarify our Group's values and what we consider acceptable. This document outlines the values, principles, and behavioural guidelines for business activity

at the STOCKMEIER Group. The objective of management is to achieve strict compliance with ethical standards and a workplace that displays integrity, respect, and fairness as its defining features. Business policies that are aligned with the law and company principles benefit the company's interests and every individual in the long term.

1.1 Who does this Code of Conduct apply to?

All employees, members of the management team and shareholders of the Group are bound by the rules outlined in this Code of Conduct.

All contractual partners that carry out work on behalf of our Group are also strictly required to uphold this Code.

1.2 Our core principles

The STOCKMEIER Group is committed to acting according to six company values in all its business activities, when dealing with customers,

suppliers and competitors, and when interacting with employees and the general public:



Respect



Trust



Courage



Passion



Sustainability



Responsibility

→ Compliance with human rights and environmental protection is the basis for all our activities.

2 Personal responsibility

This section stipulates the standards for good conduct which we expect from you – and which you in turn can expect from your colleagues and supervisors. Treating each other with respect is a company value that applies to

every one of us. We live by our values of mutual recognition and personhood. Health, safety, environment and granting human rights are our priorities.

2.1 Joint responsibility

We expect all our employees to fully adhere to this Code of Conduct in their daily activities. We each have a personal responsibility towards our company. If we all follow the rules of conduct stipulated here, we will have a working environment characterised by its integrity, respect and fairness.

This Code of Conduct applies to everyone at our company, no matter what country you are in. We comply with any applicable local regulations whilst acting in accordance with the ethical principles set out in this document.

2.2 Seeking advice and raising concerns

If issues or questions arise which you are unable to answer yourself, please turn to your supervisor or manager for support.

If this person is part of the problem, you can also go directly to the management at STOCKMEIER Holding.

2.3 Health, safety and the environment

We aim to perform our duties and design our products in such a way that they do not damage anyone's health or the environment. In order to achieve this, we must comply with three rules:

1. **Compliance with laws, standards and conduct**
2. **Responding to unsafe situations or those involving non-compliance**
3. **Respect for our neighbours and the environment**

Ensure that your activities are always in line with the legal requirements and the guidelines issued by the management.

If you become aware of an incident, a potential incident, or a near incident which led to, could lead to or could have led to damage to health or the environment, you must notify us immediately and – insofar as possible – try to limit the negative outcomes.

2.4 Human rights

Social responsibility:

We must consider the social impact of our activities on local populations. Negative outcomes should be avoided as far as possible.

Safety:

Company-wide safety requirements help to ensure the health and well-being of employees, contractors and organisations in accordance with applicable international standards.

Human resources:

Our guidelines and standards help us to develop fair working practices and a positive working atmosphere.

Contractual partners and procurement:

We strive to work with contractors and suppliers who contribute to a sustainable development and act with economic, ecological, and social responsibility.

2.5 Harassment

- The following fundamental rules apply: Every person should be treated with respect.
- We do not tolerate physical or verbal intimidation or humiliation.
- Inappropriate jokes or comments are equally unacceptable, as is displaying offensive or disrespectful material.
- If you feel anyone is demonstrating behaviour which is hostile, intimidating, demeaning, discriminatory, or disrespectful, address them and the issue openly.
- Seek support: You can seek help from your superiors, Human Resources, the works council or management at any time.

2.6 Equal opportunity

- If you make employment decisions regarding workers or potential employees, these must be based exclusively on objective factors such as performance and qualifications, and business considerations. Such decisions include hiring, appraisals, promotions, training, development, disciplinary measures, compensation and termination of employment.
- The value of diversity must be factored into all decisions: It is not permitted to discriminate against someone on account of their nationality, ethnic background, skin colour or religion, age, gender (or gender identity), family status or any disability they may have.

2.7 Use of IT and electronic communications

- The IT security requirements at STOCKMEIER are binding.
- You must use your company e-mail accounts for business communications only.
- You are not permitted to disclose your login information for the STOCKMEIER IT systems to third parties.
- Security or other configuration settings that STOCKMEIER has downloaded onto its own IT systems may only be changed or disabled on the instructions of the STOCKMEIER IT department.
- If you own a company mobile phone, you must follow the guidelines for permitted use.
- During your use of STOCKMEIER IT and communications systems, you are permitted neither to access nor to save, send or post pornography or material that is insulting or otherwise offensive. You are also forbidden from connecting to game websites and from conducting unlawful activity.
- The STOCKMEIER IT and communication systems must not be used for storing or transferring images or streaming media files for private use, nor for private business activities.
- Internet-based services (for consumers, commercial or free to use) must be approved by the STOCKMEIER IT department before business information as defined in the Group guidelines can be saved, processed or disclosed.

2.8 Protecting property

- Company property must be protected from damage, misuse, and unnecessary wear and loss. Theft and vandalism will be punished under law.
- The property of colleagues and other persons must be treated equally with respect.

3 Risk management for information and communications

This section sets out how to treat business information, personal data, and intellectual property. We are jointly responsible for the security of data belonging to our colleagues, customers and all the individuals that we work

with. The same shall apply equally to the data, and intellectual property of the STOCKMEIER Group. This is ensured through compliance with data privacy law and internal data privacy rules.

3.1 Data privacy

- Prior to collecting, using, storing or publishing personal data, e.g. in a new IT system, project or marketing initiative, the regulations and risks for data privacy must be checked and examined.
- Personal data may only be processed for defined, lawful purposes.
- If personal data is processed or disclosed to others, the owners of the data in question must always be informed. Their consent may be required in certain cases.
- Personal data must always be kept secure if it is disclosed to a third party. If you are un-

sure whether you need consent or you are uncertain about how to protect personal data when disclosing it to a third party, seek advice from your data protection officer.

- Ensure that any personal data in your possession is up to date and delete it if it is no longer in use.
- The rules published in the Group's data privacy guide and e-mail privacy policy must always be followed.

3.2 Intellectual property

- STOCKMEIER trademarks must be used in line with brand standards.
- Innovations and findings that arise in conjunction with your duties are the property of STOCKMEIER and must be shared with your supervisor.
- Business and technical information belonging to STOCKMEIER is secure and must be maintained or stored under controlled access.
- Sharing of information that is confidential to STOCKMEIER is not allowed without permission or an appropriate written agreement. Any information made available on the grounds of such an agreement must be documented – this includes the agreement itself.
- Only accept confidential information from third parties if you have been granted per-

mission to do so. This permission should be laid down in a written agreement where possible. Such third-party information must only be used or disclosed in the manner permitted.

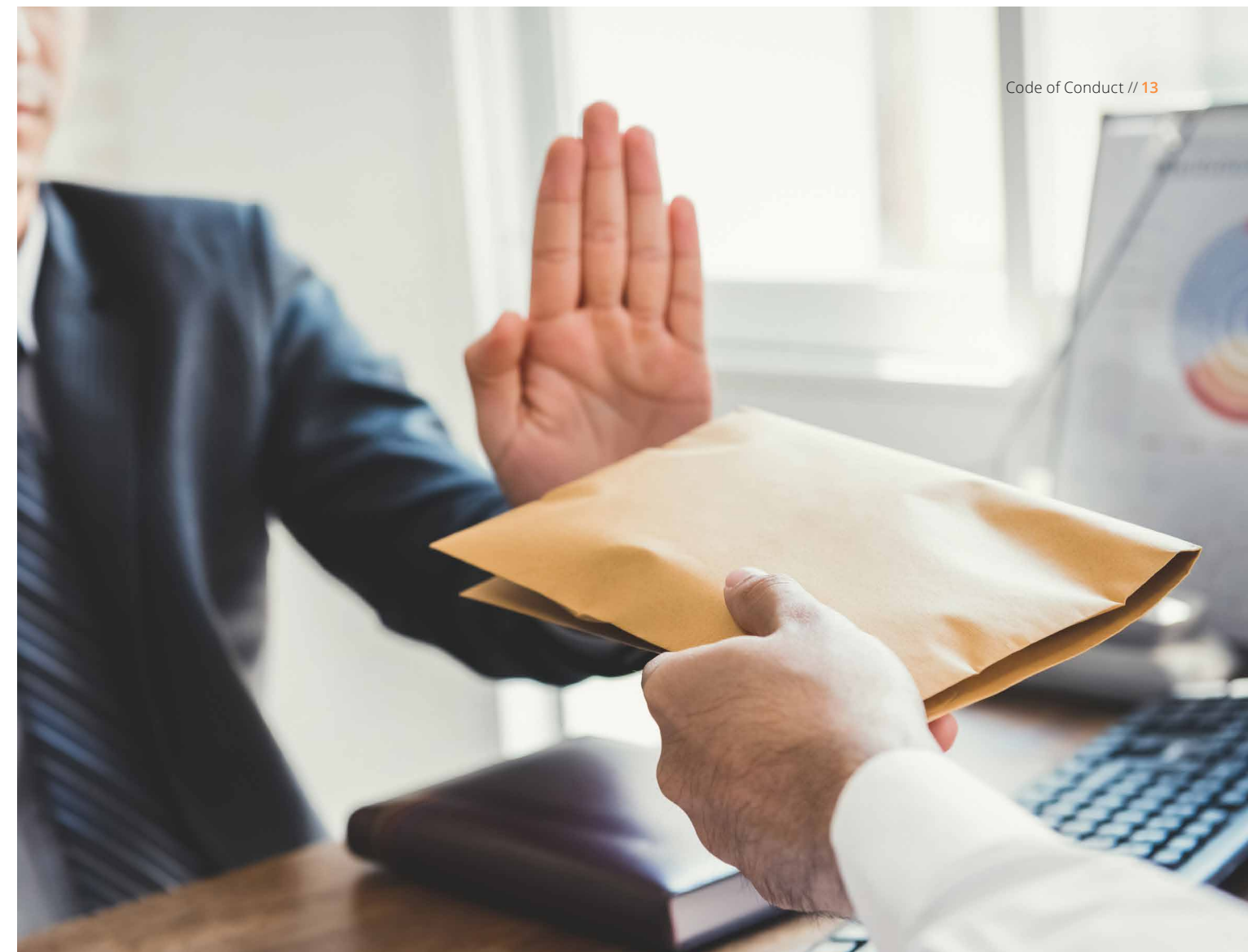
- If you are responsible for bringing new brands to market or new in-house technologies, check with your supervisor that STOCKMEIER does not infringe on the privacy rights of others.
- If you discover that a third party has infringed on or abused the rights of STOCKMEIER, e.g. by sharing documents containing confidential information, it is your duty to inform your supervisor or manager immediately.

3.3 Information management and record keeping

- Analyse the risks associated with the loss or misuse of any information that you process so that you can manage said risks accordingly and protect the information in question.
- If you work with third parties, ensure that you are authorised to share information prior to doing so.
- If STOCKMEIER has commissioned you to store information, you must ensure that it is stored as prescribed.

3.4 Public information and business communications

- We exercise caution when dealing with the press, media and social networks. Where necessary, these communication channels shall be recorded by the relevant supervisor in agreement with a member of the STOCKMEIER Holding management team.
- In the event of a crisis, only designated persons are entitled to disseminate official statements to the public.
- If it is in your job description to inform the general public and/or business partners about STOCKMEIER's business and financial affairs (including via social media), you must ensure that you have the necessary authorisation to do so. Any information you disseminate must be true, precise and consistent, and not lead to any misunderstandings.
- For any publications or statements made to the public, the STOCKMEIER company issuing the statement must always make itself known. Additionally, information required under local law and contact data (e.g. a relevant e-mail footer) must be provided.
- STOCKMEIER company commitments may only be issued by authorised persons.
- It is not permitted to engage in casual conversation regarding sensitive or confidential matters, nor to send messages containing racist, sexist, insulting, defamatory, fraudulent, or otherwise inappropriate material.
- Only trained and delegated persons may use business social media channels.
- You are not permitted to use any personal social media accounts to publish confidential business information or for other business purposes.
- If you use your own social media account for personal purposes and, while doing so, discuss topics relating to the chemical business, or support or evaluate STOCKMEIER and its products and services, you must always provide the following information:
 - You are an employee at STOCKMEIER.
 - You do not speak on behalf of STOCKMEIER.
 - The views expressed are your own and do not (necessarily) reflect those of STOCKMEIER.



4 Risk management for external and international activity

This section outlines how we deal with gifts and hospitality, conflicts of interest, political engagement and payment activities. Additionally, it defines standards and conduct regarding competition law, anti-corruption, combat-

ing money laundering, and trade compliance. As employees of STOCKMEIER, we develop fair business relationships that align with our values and rules.

4.1 Anti-corruption and corruption

- Personal payments, gifts or favours shall not be offered, received, or paid – including via third parties – in return for favourable treatment or to obtain advantage.
- The STOCKMEIER Group does not make or take bribery payments. If such a payment is requested or made, you must refuse it and immediately inform your supervisor.
- It is the duty of every one of us to ensure that we know enough about our business partners to be able to assess their integrity and soundness.
- There is a high risk of bribery in interactions with public officials. Unlike general acts of bribery, there is no obligation in such cases to prove that the official in question acted inappropriately. If any such demands are made, consult your supervisor immediately.
- You must notify the management of any corrupt conduct immediately after you become aware of it. If you ignore suspected bribery and/or corruption, STOCKMEIER or individuals at the company may be liable.

4.2 Gifts and hospitality

STOCKMEIER explicitly discourages you from accepting gifts and hospitality from business partners. However, the company recognises that giving and receiving gifts and hospitality of a modest value can often represent a legitimate way of furthering a business relationship.

You are not permitted to offer, give, seek or accept the following items and services, either directly or indirectly:

- Illegal or inappropriate gifts, hospitality, liquid funds, vehicles, personal services or credit in connection with the STOCKMEIER business.
- Gifts and hospitality in situations where the business partner in question is absent or during periods where important business decisions are being made.
- Gifts and hospitality given to or received from a third party that exceed the value of €150 – unless your supervisor and the management have granted their approval (tax law in the respective jurisdiction must be considered).

Management must be informed of:

- All gifts and hospitality over €25 in value from government officials.
- Any gifts and hospitality which could be deemed to contribute to or create a conflict of interest.
- Gifts in cash or of unreasonably high value which have been refused, including personal objects.

The following shall also apply: Prior to accepting a prize which exceeds the prescribed values, you must seek the approval of your supervisor.

4.3 Conflicts of interest

- Decision-making at STOCKMEIER must not be influenced by personal considerations or relationships, nor by your external interests or those of your family or friends.
- Management must be informed of all actual, potential and perceived conflicts of interest – regardless of whether you believe that they will actually influence your decision.
- If you are unsure as to whether a conflict of interest exists, you must consult with your supervisor or manager and take a step back from the decision that could create an actual, potential or perceived conflict of interest, or could be perceived as one.

4.4 Combating money laundering

- It is not permitted to knowingly associate with criminals or presumed criminals, nor to be knowingly involved with revenue from criminal activity.
- You must ensure that your business dealings on behalf of STOCKMEIER do not involve procuring, using, or possessing money or assets gained through criminal activity.
- If you are aware of or suspect that another party is involved in money laundering in the course of its interactions with STOCKMEIER, you must notify management immediately.
- To satisfy legal requirements, do not let the other party know of your suspicions. You are not permitted to change, hide, destroy or dispose of any relevant documents.

4.5 Political activities and payments

- STOCKMEIER funds and resources must not be used directly or indirectly to finance political campaigns, parties, candidates or other associated persons (including lobby groups).
- You must always make it clear that the political views you express or associate with are your own and do not belong to STOCKMEIER – unless you are expressly authorised to represent the views of STOCKMEIER within the scope of your role.
- Your participation in politically motivated activities must not result in a conflict of interest for you or STOCKMEIER.
- Please inform your superior immediately if you are running for public office.

4.6 Competition law

- It is not permitted to agree with competitors (even informally) the price or any aspect of the price – such as discounts, surcharges or credit terms.
- It is forbidden to come to an agreement with competitors to reduce or stabilise capacity and production.
- It is not permitted to make agreements with competitors to divide out certain customers, accounts or markets.
- Offers and tenders must not be interfered with.
- It is forbidden to make agreements with others to boycott a customer or supplier – except in conjunction with international sanctions.
- It is not permissible to set a minimum or resale price for an independent retailer, distributor or redistributor.
- Information which is classed as sensitive under competition law must not be disclosed or received without lawful basis.
- Discussion with competitors on matters which competitors are not lawfully allowed to agree is forbidden.
- The principle that all decisions regarding STOCKMEIER prices, products, customers and markets are to be made exclusively by the company must be followed.
- You must leave industry meetings or other events if issues relevant to competition arise. Ensure that your departure is documented and inform the CFO of STOCKMEIER Holding immediately.
- Notify the CFO of STOCKMEIER Holding if you know of any practices that potentially violate competition law or if you are unsure of the legality of any practices.
- The regulations set out in our competition law guide must be followed at all times.

with a restricted/sanctioned party, you must strictly uphold company guidelines.

- When manufacturing, selling, exporting, and importing military and defence goods or drugs, the involvement of the Department of Foreign Trade at STOCKMEIER is compulsory.
- If you are confronted with a restrictive trade enquiry, you must obtain approval from the Department of Foreign Trade at STOCKMEIER before proceeding.

4.7 Trade compliance

- For all goods and software products moved between countries, the correct classification as defined by customs and export control must be shared, stored and communicated. For the physical movement of goods and software, information relating to evaluation and origin must also be supplied.
- The company regulations must be complied with when travelling with company devices and hardware, including laptops, smartphones and other communication devices.
- When subcontracting services to trade/customs agents, business processes must be observed.
- Company guidelines must be followed when issuing or drafting an end-user certificate.
- Ensure that all third parties you encounter have been thoroughly checked against the applicable sanctions lists.
- If, in your interactions with third parties, you recognise suspicious circumstances or “red flags”, you must contact the Department of Foreign Trade at STOCKMEIER.
- Trade in a sanctioned country or with a sanctioned party is not permitted – unless it has been expressly approved as acceptable in terms of business processes. If you are entitled to trade in a sanctioned country or





To another 100 years of business success

We understand that the thought of having to observe so many guidelines and rules will fill some of you with trepidation. However, they are vital for us as a Group and employees within this Group to ensure that we operate lawfully and future-proof our business in today's market. Please ensure you always act in compliance with the regulations set out in this document.

Thank you for your support!

The management of STOCKMEIER Holding GmbH, June 2020



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Note on gender:
For readability, we avoided the use of gender-neutral language within this document. Terms used refer to all genders equally.

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