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AnalytiChem GmbH Code of Conduct

Foreword

For almost 50 years, we have been operating out of our German sites as a medium-sized manufacturer of laboratory chemicals, analytical reagents and standards on the national and international market – with a consistently fair approach based on partnerships and with the aim of achieving mutual success in every collaboration. Our business activities are shaped by an acute awareness of our social responsibility, underpinned by our promise to ensure a decent future for coming generations through sustainability.

To fully meet these aims, we are committed to the 17 goals of the UN Global Compact and the Ethical and Business Principles of the European Association of Chemical Distributors (FECC).

<u>Scope</u>

Through this approach, we act with integrity and follow our binding Code of Conduct with an expectation of full compliance from everyone – directors, managers, and each and every employee, as well as our suppliers, sub-contractors and business partners. If we discover that suppliers have not upheld social standards or human rights in their business practices, this will cause a conflict of interests – and we will take appropriate action.

The Executive Board

Duisburg, 01/01/2023

Frank Fürst Timo Roßhoff

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Our responsibility towards each other

Our company fosters stable, respectful and trusting relationships with customers, suppliers and service providers; the Executive Board of AnalytiChem GmbH highly values fair, open and honest dealings between all members of our corporate family. This creates a stable basis for harmonious, productive interaction.

The Executive Board is committed to exemplifying and maintaining regular, open information-sharing and exchanges of ideas throughout the company, and to promoting visionary ideas consistently. All employees are encouraged and motivated to be independent and act with initiative, and are given their own decision-making powers as appropriate in their particular fields of expertise. We also support career management within the company.

As an employer in the Federal Republic of Germany, it goes without saying that we apply all relevant national labour regulations. These include the right to freedom of association and assembly, the right to collective bargaining, and compliance with the General Act on Equal Treatment (Anti-Diskriminierungsgesetz), the Minimum Wage Act (Mindestlohngesetz), the Working Hours Act (Arbeitszeitgesetz) and the ban on child labour (individuals aged under 15).

We do not tolerate any form of slavery, human trafficking, forced labour, compulsory labour, bonded labour or forced prison labour, and instead treat our fellow humans with respect and preserve their dignity at all times. We flatly reject any form of bodily publishment or physical, psychological, sexual or verbal abuse or coercion in the workplace. We treat all employees equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religion or world view. At AnalytiChem GmbH, we also promote integration, tolerance, equal opportunity and diversity.

The highest standards of integrity must be maintained in business dealings. AnalytiChem GmbH respects the personal interests and private lives of all employees. We attach great importance to avoiding conflicts of interest, or even just the impression of them, between private and business interests. Employees must uphold impartiality and disclose every conflict of interest.

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Responsibility towards society

We undertake to comply with national legal provisions and regulations and to uphold the law of the European Union and United States of America. We practice our business activities fairly, honestly, incorruptibly and justly in accordance with strict compliance rules. We apply the relevant legislation and embargo directives to our exports.

We uphold fair competition by complying with all applicable national and international rules under anti-trust law and trade control.

We do not tolerate corruption in any form whatsoever. The unlawful granting of advantages to third parties – such as public officials or employees at private companies – is prohibited. The prohibition of corruption applies without restriction, i.e. regardless of to whom, in which part of the world and for what reason such benefits are granted. The prohibition of corruption also means that personal advantages must not be demanded, accepted, offered or granted in connection with business activities.

We neither practice nor tolerate extortion, offers of influence, price agreements, fraud, promises or gifts that may be or are intended to acquire or retain business advantages. Should we discover from our controlling data or through other information that employees at our company are corrupt, taking or receiving bribes, acting anti-competitively or laundering money, we will impose appropriate sanctions to protect the company. These may include immediate termination of the employee's employment contract and a criminal charge depending on the severity of the deed. 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 or corruption, to the finance department for review.

We have established a testing process as part of product development. This ensures that we only process legally usable raw materials and manufacture products that can be managed safely in terms of both transportation and use. Where feasible, we reduce the use of hazardous substances. Where this is not possible, we take all required measures and provide the necessary equipment to safely and lawfully purchase, use and market our raw materials and products in compliance with applicable chemical law (for example the REACH Regulation and CLP Regulation).

We only use raw materials from sources that ensure no conflict minerals are used – and demand our suppliers provide suitable confirmation of this. This ensures we have a sustainable supply chain on the basis of the CMRT (Conflict Minerals Reporting Template) developed by the RMI (Responsible Mineral Initiative).

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Data protection/company information and property

We ensure that modern information and communication technology is used appropriately. Personal rights and data of our customers, contractual partners and employees enjoy the highest possible protection. We handle this data with utmost sensitivity and in compliance with the provisions of the European General Data Protection Regulation and Federal Data Protection Act (Bundesdatenschutzgesetz), and in accordance with the confidentiality agreements we have entered into.

We take the necessary steps to suitably protect confidential information and business documents from access and inspection by unauthorised colleagues and other third parties.

The intellectual property of our company is a competitive advantage and is therefore a valuable asset that we protect against all unauthorised third-party access. Intellectual property includes inventions, product and packaging prototypes, formulations, product concepts, details about customers and suppliers, and other trade secrets. Every single employee should help to protect this information.

Confidential information concerning the company must be kept secret. That is, it must not be disclosed to unauthorised persons – this includes family and friends.

We use the company's property and resources correctly and carefully and protect them from loss, theft and misuse.

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Occupational health and safety and environmental protection

AnalytiChem GmbH is committed to the ecological and ethical values of our culture and society through compliance with applicable laws and regulations. We also participate in the global Responsible Care initiative developed by the chemical industry.

We give our employees extensive training in environmental protection and occupational health and safety to ensure they are always aware of the existing guidelines and so can perform their work responsibly.

Occupational health and safety

The safety and health of our employees are a corporate objective of equal standing with the quality of our products and our commercial success. Occupational safety and health protection are an integral part of all business processes and are included from the outset – starting in the planning phase – in all technical, economic and social considerations. We provide a safe, healthy working environment in close dialogue with our employees through compliance with legal regulations. To this end and to prevent hazards, we undertake effective, systematic occupational safety management that includes risk assessments, safety instructions and regular reviews of these, as well as an extensive training programme. Furthermore, we run an ongoing occupational-medicine screening programme in close liaison with safety experts and occupational doctors to ensure that any unforeseeable health issues that arise can be identified and treated promptly.

As a manufacturer of laboratory chemicals and chemical reagents, we attach great importance to occupational safety in our business activities and follow DIN EN ISO 45001. To guarantee hazardous substances are handled safely at all times, we have introduced a Control Banding System: the "Easy-to-use workplace control scheme for hazardous substances" (Einfache Maßnahmenkonzept Gefahrstoffe – EMKG) developed by the Federal Institute for Occupational Safety and Health (Bundesanstalt für Arbeitsschutz und Arbeitsmedizin – BAuA). This enables our employees to easily and clearly determine and use the correct technical equipment for all hazardous substances and mixtures used; it also enables them to take organisational measures when dealing with hazardous substances and to select suitable personal protective equipment. In this way, we prevent our employees from suffering negative effects to their health from handling hazardous substances.

Insights from occupational healthcare are constantly incorporated into our measures for the continuous improvement of occupational health and safety.

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Environmental protection

For us, sustainability, environmental and climate protection and resource efficiency are key corporate objectives. We take our responsibility to our fellow humans and future generations very seriously by contributing to environmental protection and reducing greenhouse gases through sustainable conduct. To this end, we follow the environmental management system under ISO 14001.

We are prepared to take environmental protection measures beyond the statutory and regulatory requirements where we, acting under our own responsibility, believe this is appropriate, taking into consideration ecological and economic factors. For example, when operating any equipment, we always take due care in terms of safety and emissions regardless of whether the equipment in question requires a permit or not.

We calculate and reduce our energy consumption in appropriate ways and pay close attention to our water management – always with the aim of conserving resources and avoiding pollution as much as possible.

When making new investments, we are committed – where appropriate and economically feasible – to using technologies that enable a significant reduction in our energy, fuel and water consumption.

Our business activities do not impact protected areas, animal protection or the conservation of endangered species. We also strive to prevent our business activities from causing any damage whatsoever to biodiversity in the future.

Even when planning our products, we pursue the goal of enabling our customers to use laboratory chemicals and chemical reagents sustainably. Because we produce customised, made-to-order finished reagents, we can offer a unique tool for substituting pure substances that are mostly much more hazardous.

We consistently prevent or reduce waste generation. Where waste is unavoidable, we manage it as effectively as possible by fully meeting the legal requirements for separating recyclable materials and hazardous waste.

We also help our customers to correctly dispose of the waste that may be generated in the use of our products – and therefore offer a free take-back service for our used chemical packaging.