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**GREMOLITH**  
Resins & Composites

# Compliance / Code of Conduct





Bazenheid - May 12, 2023

## Compliance / Code of Conduct

For decades, Gremolith AG stands traditionally for responsible, entrepreneurial action in the production of synthetic resins and other chemical products.

This Code of Conduct sets out the basic principles and standards of behavior for our company. Our goal is both to comply with ethical norms and legal standards as well as to create a corporate culture that promotes integrity, respect, diversity, and fair conduct. A law-abiding and value-oriented business policy serves our long-term corporate interests and supports fair competition, also in relation to our customers, suppliers, and partners.

All employees, as well as members of the Executive Board and the Board of Directors, are bound by these regulations.

**Jochen Keller**  
CEO/Delegate of the Board of Directors



## 1. Health, safety, and environment

**The protection of our employees and the environment is a central concern for us.**

Health, safety, and environmental protection are of high importance in the entire value chain of Gremolith AG. We continuously optimize our procedures and processes in terms of health, safety, and environmental protection. With a high sense of responsibility and exemplary actions we ensure

- + the compliance with safety standards to avoid accidents,
- + the health protection of our employees,
- + the responsible handling of chemicals to ensure product safety in the product life cycle,
- + the environmentally friendly and energy-saving design of our plants and processes to avoid waste and waste of energy resources.

## 2. Business integrity

**We practice fair competition.**

We respect our competitors, comply with the rules and regulations of competition and antitrust law, and act in accordance with international competition rules.

## 3. Prohibition of corruption

**We do not tolerate any form of corruption or personal benefit in the conduct of our business activities.**

We do not tolerate corruption, bribery or business with unfair means in national and international business transactions. We neither offer benefits to business partners and public officials, nor do we accept their gratuities that could lead to or appear to impair an objective and fair business decision. We are obligated to report business partners or public officials who offer or request a corresponding personal benefit.

Exceptions are the acceptance and giving of token and low-value promotional gifts or in the case of invitations that are within the bounds of customary business hospitality and courtesy. The acceptance of cash is prohibited in all cases.

## 4. Prohibition of fraud

**We do our job reliably and honestly.**

We have internal control systems in place to detect and prevent fraud. Financial transactions are conducted in compliance with internally defined approval and reporting principles. We comply with anti-money laundering laws and only enter transactions with reputable partners.

## 5. Conflicts of interest

**Private interests must be kept separate from the interests of the company.**

We are loyal to our company. We avoid situations in which our personal or financial interests, conflict with those of Gremolith AG. Therefore, we are especially forbidden to participate in competitors, suppliers or customers or to enter into business relationships with them in private.

## 6. Handling of company property

**We handle company property and assets with care.**

We commit ourselves to a proper and careful handling of company property so that assets of Gremolith AG are protected against loss, damage, misuse, theft, embezzlement, or destruction. If we accidentally damage company property, we deal with this circumstance openly, honestly, and fairly.

The private use of company property is tolerated in special cases but requires the prior approval of the supervisor.

## 7. Handling of information and data protection

**We protect the intellectual property of our company and the personal data of our employees.**

We protect the intellectual property of Gremolith AG. This includes trade secrets such as recipes, processes, and patents, but also business strategies, projects, as well as non-published financial information.

We take the greatest care to ensure that no confidential information, either in printed or electronic form, unintentionally falls into the wrong hands.



All personal information about employees, customers, business partners and suppliers as well as other third parties is used carefully and treated confidentially by us, in full compliance with data protection laws.

## 8. Imports and exports

**We comply with the trade control laws in force worldwide.**

We do business in an international environment that is subject to numerous strict trade controls in the cross-border movement of goods. In all cases, we observe the applicable import and export restrictions, which may relate to country and company embargoes as well as any technology or product bans.

## 9. Social responsibility

**We respect international human rights and reject discrimination of any kind.**

A tolerant, appreciative and respectful interaction among employees is part of the corporate culture of Gremolith AG. Therefore, we do not tolerate condescending, demeaning, insulting or in any other way disrespectful words and deeds among each other.

We treat all employees and business partners equally – regardless of their origin, nationality or skin color, faith, gender or sexual orientation, age, severe disability, or physical constitution. Harassment in any form is prohibited at our company. Every employee has the right to be protected from harassment in the workplace.

Furthermore, we respect and support the basic principles and conventions of the United Nations.

- + Protection of international human rights as well as prevention and elimination of human rights violations that arise in connection with the activities carried out or products manufactured for us.
- + Compliance with social standards such as minimum wages and fair working hours, and respect for freedom of association.
- + Elimination of forced labor.
- + Elimination of child labor.

## 10. Compliance with the Code of Conduct

The rules contained in this Code of Conduct represent an important basis of the corporate culture of Gremolith AG and are binding for every employee. Non-compliance may lead to disciplinary measures up to dismissal.

If you as an employee have reason to believe that there has been a suspected or actual violation of the behavioral guidelines contained herein, you should contact your immediate supervisor if possible. If this is not possible for factual or personal reasons, you may contact a member of management in confidence.

The processing of the hints is done with high confidentiality and conscientiousness. Gremolith AG does not allow any disadvantages due to reports made in good faith within the scope of this code of conduct.

**Key guidelines from international organizations:**

- + Principles of the United Nations Universal Declaration of Human Rights
- + International Labour Standards (ILO)
- + United Nations Global Compact
- + OECD Guidelines for Multinational Enterprises
- + Core Labor Standards of the International Labor Organization (ILO)
- + UN Convention on the Rights of the Child
- + Responsible Care Global Charter

