



CODE OF CONDUCT

Dear colleagues.

Respect, honesty and fairness are core values of Felix Schoeller. They play a key role in shaping our corporate culture and are an aspiration for ourselves and a promise to our customers, business partners, society and the public.

This Code of Conduct serves as a guideline for living our values and commitments within the company and anchoring them in our actions. It summarises the fundamental principles and rules that every employee, the management and the Advisory Board of Felix Schoeller must adhere to in order to comply with legal and internal regulations.

Use this set of rules in your day-to-day work and, if in doubt, seek advice and support. It is up to all of us to ensure that Felix Schoeller stands for excellent products as well as integrity and fairness as a responsible employer.

For our Canadian employees: Please be informed that the French version of this content will be published soon.

Your Board of Executives

Every employee is obliged

- to follow **Felix Schoeller's mission statement** in their work.
 - to comply with the laws, regulations and internal instructions applicable in their area of responsibility.
 - to be fair, respectful and trustworthy in all activities and business relationships.
 - to respect and promote the reputation of Felix Schoeller.
 - to avoid conflicts of interest between business and private matters.
 - not to obtain any unlawful advantages for themselves or others.
 - to comply with the laws and regulations on health and safety at work, environmental protection and data protection.
 - to report compliance violations to the Compliance Officer without delay.
-

Do you have questions or want to report an incident?



Compliance Manager

Mechtild Kerkhoff

+ 49 541 3800 321



CONDUCT AS A BUSINESS PARTNER

Combating corruption and bribery

Corruption harms competition, prevents fair play, is not in line with our corporate values and exposes Felix Schoeller and each and every one of its employees to unnecessary liability risk.

It is strictly forbidden

- offer, promise or grant a personal advantage to domestic or foreign public officials in connection with their official position for the performance or omission of an official act.
- Offer, promise or grant unlawful personal benefits to employees or agents of domestic or foreign companies.
- to support unlawful acts of other persons.
- To have unlawful acts performed with the assistance of others, such as relatives, friends, agents, consultants, planners and intermediaries.
- Demand or accept unlawful personal benefits.

Invitations, gifts and events

The handling of invitations, gifts and participation in events is subject to clear compliance guidelines.

Invitations and gifts are part of human interaction and polite dealings. Employees of Felix Schoeller are permitted to extend invitations and gifts to business partners and to accept invitations and gifts from them, provided that they are within reasonable limits.

To avoid even the appearance of corruption, the **following rules apply**.

- Employees of Felix Schoeller must refuse invitations and gifts if they are obviously or presumably linked to a specific expectation of some kind of consideration in return.
- Employees must also refuse invitations and gifts if accepting them would violate the law or internal directives.
- Employees of Felix Schoeller are not permitted to demand benefits
- The same applies to the granting of benefits.
- Participation in specialist events is permitted and encouraged. The same applies to the organisation of specialist events.
- Invitations to and participation in social and recreational events in the business environment are permissible if they are within reasonable limits. Under no circumstances may they even give the impression of harming fair competition or mixing interests.

Fair competition and antitrust law

Violations of antitrust law not only contradict the understanding of fair competition, but can also lead to substantial fines and claims for damages.

- Competition law and antitrust law must be observed.
- No prices, quantities or conditions may be exchanged or agreed with competitors.
- Agreements with competitors on market sharing are not permitted.
- Agreements on capacity control are not permitted.
- These rules must also be taken into account in the association's work. Industry statistics without the identifiability of individual companies are permissible.

Further information

Training document Competition and Cartel Law

Foreign trade, export control and money laundering

Felix Schoeller observes the legal standards of national and international law that are relevant to export control, thereby fulfilling its role as a globally active company.

Licensing requirements in connection with the export of our products must be strictly observed. Export and support bans must be observed without exception.

The customs regulations currently in force must be complied with both when exporting and importing goods.

Felix Schoeller only works with reputable business partners who comply with the law and do not use any illegal financial resources. Every employee must comply with the laws against money laundering and report any suspicions of money laundering to the Head of CC Finances and the Compliance Officer without delay.

Further information

European Union sanctions -EuropeanExternalActionService (europa.eu)



BEHAVIOUR AS AN EMPLOYEE

Equal treatment and anti-discrimination

Mutual trust and respect are a self-image of the organization.

We respect the rights and dignity of all colleagues and strive for a working atmosphere characterized by mutual trust and respect.

Discrimination on the grounds of race, ethnic origin, nationality, religion, gender, ideology, disability or age is strictly prohibited. This applies to dealings with colleagues, employees and business partners as well as to the hiring, promotion or dismissal of employees.

Further information

- **Corporate mission statement**
 - **Leaflet on the General Equal Treatment Act**
-

Occupational health and safety

As an employer, we want to offer our employees a safe and healthy working environment. This also applies to employees of third parties who are employed at Felix Schoeller sites.

In the interests of the health and safety of all employees and visitors, every employee must comply with the applicable laws, regulations and standards on occupational safety at their workplace.

Further information

- **Information on occupational safety**
-

Protection and proper use of company assets

The Company's property and the property of third parties such as our customers and business partners must be respected and treated with care. Everyone in the Company is personally responsible for protecting Company assets from loss, destruction, misuse, theft, waste or other damage. It should be noted that the protection of property refers not only to tangible assets, but also to intellectual property such as copyrights and trade secrets, which we also use in accordance with applicable law and within the scope of permitted use.

As a matter of principle, company property is to be used only for business purposes. Company assets may not be used for private or illegal purposes. In addition, the purchase and sale of company assets must be transparent, understandable, cost-effective and at fair market conditions. Personal interests of individual employees must not influence decisions and business transactions.

Further Information

- **Intellectual Property**
-

Avoidance of conflicts of interest

- Each employee must strictly separate his or her private interests from those of the company. Even the appearance of a conflict of interest must be avoided.
- In order to achieve this, the following assignments may only be given and activities carried out if they have been approved in advance by the responsible member of the Board of Executives.
- Assignments to related parties (for example, spouses, relatives, friends and private business partners).
- Orders to companies in which related persons work
- Contracts with companies in which related parties have a shareholding of 5% or more.
- Secondary activities for competitor companies

- Secondary activities for business partners



HANDLING OF INFORMATION

Data protection, information technology and social media

As a company with international operations, Felix Schoeller considers the use of modern information and communication technology to be an indispensable part of its business processes. Employees are obliged to handle personal data sensitively in all business processes, and data may only be collected, used and stored in accordance with the applicable data protection laws. This applies to data for employees as well as to data from customers, suppliers, competitors and others.



In particular, data may only be processed if the person concerned has given his/her prior consent or if this is legally permissible for other reasons. Personal data must be handled sparingly; its processing must be necessary in every case. To ensure effective data protection, Felix Schoeller has appointed data protection officers and issued appropriate guidelines.

We expect our employees to support the company in protecting the entire infrastructure and data of the IT systems against deliberate malicious acts by persons inside or outside the company. Great care must be taken with the content of emails, attachments, downloaded files and stored linguistic resources. We ensure the security of our passwords and do not pass them on to other employees or third parties under any circumstances.

In social media channels, Felix Schoeller, our products and our colleagues as well as our customers and business partners are to be treated with respect and public expressions of opinion are to be formulated in such a way that it is recognisable that they are private opinions and not the opinion of the company.

Freedom of the press and the right to express opinions freely is a valuable asset. This is abused when it is associated with defamation and exclusionary statements towards third parties. Felix Schoeller does not tolerate this in any way.

Further information

- **Leaflet on the obligation to maintain confidentiality**



SOCIAL RESPONSIBILITY

Environmental protection and social responsibility

Every employee shares responsibility for environmental protection in his or her area of work and is obliged to comply with the laws, regulations and standards on environmental protection.

We also take our social responsibility with regard to nature and our environment very seriously and act sustainably. As part of our sustainability strategy, we measure and improve our sustainability performance using indicators that are oriented in eight goals relevant to the Schoeller Group from the 17 Social Sustainability Development Goals (SDG) of the United Nations.

In the production and distribution of our products and services, we make every effort to maintain the ecological balance, avoid environmental pollution and conserve scarce natural resources (water, energy, materials and soil). In addition, we contribute to the reduction of CO2 emissions.

Further information

17 Social Sustainability Development Goals (SDG)

Donations and sponsoring

As a responsible member of society, we are not afraid to take on social responsibility, which is why the promotion of education, science, environmental protection, art, culture, social issues and sport is an important concern for us. We do this by donating money and goods for non-commercial and charitable purposes. Felix Schoeller also acts as a sponsor of events and projects for the above-mentioned purposes.

Donations may only be made with the prior approval of the relevant managing director.

Sponsorship and the making of donations must be carried out in accordance with the applicable laws and the above regulations to avoid corruption and conflicts of interest and to protect the company's assets.



REPORTING AND WHISTLEBLOWING PROCEDURES

At Felix Schoeller, we live a culture of open communication. Questions can be asked and concerns expressed about possible misconduct at any time. Our dealings should be characterised by mutual respect and trust so that we can discuss misconduct in an open and constructive dialogue.

To ensure that open communication and conduct by all employees is consistent with this Code of Conduct, applicable laws and regulations, and our internal policies and organizational directives, we rely on the support of every employee. Violations can be reported in person through direct contact with the line manager, the Compliance Officer or via the digital reporting system (anonymously).

On the other hand, Felix Schoeller ensures protection against retaliation for reporting concerns of any kind. Care is taken to ensure that employees who report possible violations in good faith and without malicious intent do not suffer any disadvantages as a result. In addition, no one who participates or cooperates honestly in our Company's investigation will be subject to retaliation. Any actual or threatened retaliation will be considered a serious violation of this Code of Conduct.



Access to the Whiste Blower System

Access to the Whistleblower System

for anonymous reports, access the system via this link

Further Information

Whistleblowing policy



CONTACT AND COMPLIANCE OFFICER

If you have any concerns or questions about this Code of Conduct, you can talk to people in your immediate work environment, such as your supervisor, or you can contact the appropriate department, such as Human Resources for questions about employment contracts.



If clarification with your supervisor or the relevant specialist department is not possible, or if you still have concerns, the Compliance Officer is available as a point of contact. The Compliance Officer can also be contacted directly in confidence at any time if desired.

If violations of the Code of Conduct become known, there is even an obligation to inform the Compliance Officer immediately.

Contact details of the Compliance Officer

Mechtild Kerkhoff

Senior Vice President Corporate Office

Felix Schoeller Holding GmbH & Co KG
Burg Gretesch
49086 Osnabrück

Phone: +49 (0)541 3800-321

Mobile: +49 (0)175 294 8140

mkerkhoff@felix-schoeller.com