

Corporate Compliance Policy

Applicable to:

KLEIBERIT SE & Co. KG

General:

To meet our global responsibility and to be successful through innovation, quality, reliability and fairness in competition, company specific goals and regulations are needed. The Corporate Compliance Policy serves as the basis for the actions and decisions of our employees and management.

Principle of sustainability:

1. Fair and respectful working conditions/ basic employee rights

- **Human Rights:** KLEIBERIT SE respects, supports, and monitors compliance with internationally recognized human rights.
- **Approach to Child Labor:** The exploitation of children and adolescents will not be tolerated.
- Friendly, professional, fair and respectful interaction with colleagues and third parties is expected from every employee.
- **Disciplinary Measures and Approach to Employees:** All employees are to be treated with dignity and respect. Sanctions, fines, other penalties or disciplinary measures may only be imposed under strict observation of applicable national and international laws and norms, as well as internationally recognized human rights.
- Discrimination, harassment and intimidation of any kind, whether physical, sexual or psychological, will not be tolerated. Equal opportunities and equal treatment are essential components of our Corporate Compliance Policy.
- Freedom of speech and expression will be protected and ensured.
- **Freedom of Association and Collective Bargaining Rights:** Rights of all employees to freedom of association in employee organizations (e.g. trade unions) is upheld and supported.
- **Approach to Forced Labor:** All forms of forced and/or compulsory labor (slavery and human trafficking) is prohibited. Compliance with applicable EU regulations concerning slavery and human trafficking (e.g. Directive 2011/36/EU – preventing and combating trafficking in human beings and its victims; The Modern Slavery Act 2015 – transparency in supply chains) is essential.

2. Environment and Occupational Safety

- KLEIBERIT SE is aware of its responsibility for the protection of the environment as well as the health and safety of the people.
- **Occupational Health and Safety:** KLEIBERIT SE ensures a safe, healthy and hygienic working environment, and to takes all required measures to prevent working accidents and health impacts. To ensure occupational health and safety, all employees are requested to implement the internal and legally required safety regulations in their workspace. Every employee is jointly responsible for safety in their area. The active involvement of employees and trainings regarding occupational safety are essential for continuous improvement and accident prevention.
- **Worktime:** Worktimes comply with respective national laws, industrial sector standards, or the relevant International Labour Organization (ILO) conventions, whichever are stricter.
- **Wages and Social Benefits:** We ensure that we pay our employees the legal minimum wage or the wage prescribed in the chemical industry, as well as provide appropriate social benefits.
- **Training and Qualification:** The professional skills of our employees are promoted at all levels through suitable training and further education measures.
- **Complaints Mechanisms:** KLEIBERIT SE has implemented an anonymous whistleblowing and complaints system for its employees.

- Sustainable development is only made possible by the efficient use of all resources. In order to keep emissions as low as possible and at the same time to reduce the use of energy and raw materials, our employees are requested to use all reasonable options regarding viable process optimization. Our production lines may only be constructed and operated in accordance with the legal requirements.
- **Environmental and Climate Protection:** KLEIBERIT SE implements environmental and climate protection, in accordance with applicable legal requirements and international standards.
- **Waste and Emissions:** We have established procedures and systems to ensure the safe handling, transportation, storage, reuse and management of raw materials, materials and waste.
- We ensure a high level of plant and process safety through careful plant planning with appropriate safety equipment and programs in accordance with the applicable safety standards. To avoid accidents or incidents, plants are systematically and regularly inspected and maintained.

3. Responsible Business Practices

- Corruption or bribery will not be tolerated in any form. The respective anticorruption laws are observed.
- Fairness in competition (with fair means).
- **Confidentiality and Data Protection:** Our business data and trade secrets may not be disclosed to third parties or made public. The property rights of third parties are to be respected. The agreed data protection regulations shall be complied with.
- Separation of corporate and private interest: Executive management and all employees must segregate their private and company interests.
- KLEIBERIT SE assures that:
 - compliance concerns regarding inappropriate behavior or misconduct in the organization are reported in good faith; and
 - employees reporting such concerns are protected from retaliation such as termination of employment, threats, harassment or other adverse measures.
- **Export and Import:** KLEIBERIT SE complies with all applicable import and export control laws.
- **Antitrust and Competition Law:** KLEIBERIT SE complies with all applicable national and international antitrust laws, as well as the laws against unfair competition.
- **Compliance with Laws, Recognized Standards and Guidelines:** All applicable national laws and relevant internationally recognized standards, guidelines and principles are complied with.

4. Product Responsibility

- Conflict minerals in terms of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank-Act): we are aware of the social responsibility with respect to the environment and human rights. To facilitate the peaceful and fair use of worldwide resources, we support the provisions specified in the Dodd-Frank-Act concerning the exclusion of “conflict minerals” in our products.
- **Product Safety and Responsibility:** We comply with the relevant laws and legal requirements. Our corresponding product information is provided to every customer.

5. Cooperation with government agencies

- KLEIBERIT SE maintains a cooperative relationship with all responsible government agencies. Information will be provided in a complete, open, correct, timely and understandable manner.

6. Proper record keeping and financial reporting

- Business processes are documented as part of an internal control system. External controls regularly ensure the complete and correct recording of accounting data.

Implementation and Requirements:

Every manager must organize their department so that it complies with the rules of the Corporate Compliance Policy, internal company rules as well as legal requirements.

All employees are required to immediately communicate any violation of the Corporate Compliance Policy to our “Corporate Compliance Policy Representative” or via the internal complaints platform. Executive management will decide on and initiate appropriate measures.

KLEIBERIT SE’s business partners, suppliers and contractors will be requested to comply with our principles in the Corporate Compliance Policy.

KLEIBERIT SE reserves the right to verify compliance with the aforementioned principles either through independent third parties, certificates and statements or topic-specific audits on site.

Any material breach of the above obligations will be considered by KLEIBERIT SE as a breach of contract and will be legally evaluated in each individual case.

If possible, we will grant the parties involved the opportunity to implement appropriate remedial measures.

The Corporate Compliance Policy will be reviewed on a regular basis and adapted according to current requirements (e.g. legislative changes).

Weingarten, 21.02.2023

Dr. Helmut Meffert
Managing Director

Leonhard Ritzhaupt
Managing Director

PDF – online version. Valid without signature. Signed version can be viewed at the QM Dept.