

# CODE OF CONDUCT



## FOREWORD

Dear Colleagues,

This SAFECEM Code of Conduct combines the important binding basic rules and principles of our company in one document. SAFECEM is an international company and therefore our standards of conduct are the same internationally, applying also to our legal entities in the US, UK, Mexico and China.

The SAFECEM Code of Conduct applies equally to all of us - to management, to managers and to every single employee. The Code governs the conduct with business partners, especially distributors, customers, authorities, public officials, other employees and the company. The Code helps us to make the right decision but cannot describe every situation you could face. SAFECEM will give you all of the necessary information and support that you need to enable you to fulfil your obligations. In case of doubts, ask!

Thank you for your commitment.



Manfred Holzleg  
(Managing Director)



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## I. SAFECHM CODE OF CONDUCT - INTRODUCTION

SAFECHM is a specialised and experienced provider of products and services for the safe and sustainable use of chlorinated and non-chlorinated solvents for surface cleaning, textile cleaning, and asphalt analysis. We serve over 5,000 customers worldwide with offices in Duesseldorf (Germany) and Shanghai (China) and a network of qualified distribution partners.

SAFECHM is strictly committed to compliance with legal regulations and ethical principles and expects all its employees to abide by them. Such commitment must be firmly anchored in the entire organisation because every employee is also an ambassador of our company. Conduct in conformity with the law is the priority at all times. There can be no compromises here.

This SAFECHM Code of Conduct summarises important laws and internal company requirements which govern the conduct of all SAFECHM employees in dealing with business partners, especially distributors, customers, authorities, public officials, other employees and the company.

SAFECHM is a globally operating company. Our standards of conduct are, therefore, uniform throughout the world as well and set down in this Code of Conduct.

## II. OUR PHILOSOPHY, OUR MISSION, OUR OBJECTIVES

### OUR CUSTOMERS

Our customers are the focus of our activities. It is, therefore, important for us

- to offer our customers high-quality, innovative solutions;
- to respond to the changing requirements of our customers;
- to act responsibly towards humankind and the environment.

### OUR BUSINESS PARTNERS, ESPECIALLY DISTRIBUTORS AND SUPPLIERS

SAFECHM regards business partners, especially distributors and suppliers, as partners.

### OUR PRODUCTS

We consider ourselves responsible for the sustainable and innovative use of our products and particularly of our chemicals. SAFECHM has committed itself, therefore, to the Guidelines of Responsible Care® and Product Stewardship.

### OUR EMPLOYEES

We consider our employees to be representatives of our company.

### OUR INNOVATION

Innovative spirit and innovative capacity are the driving force of our development. They motivate us as company and each individual.

### III. CODE OF CONDUCT

#### 1. COMPLIANCE WITH LEGAL REGULATIONS, ETHICS

- (1) The fundamental precondition for any action in the interest of SAFECHM is to act lawfully. Every employee must comply with the company's applicable internal regulations and the legal regulations of the legal system in which he/she is acting. Violation of the law must be avoided under all circumstances.
- (2) However, in situations as well where no legal regulations set limits, we must conduct ourselves in the manner we would expect others to conduct themselves. "Ethics" are, therefore, explicitly the standard for our conduct.
- (3) Ethical and legally compliant conduct is the responsibility of each individual. The environment must, however, support this by business results not being valued higher than conduct of integrity. This gives rise to the duty of all management staff to act as a role model and set the employees this example in a credible manner. Management staff shall ensure that employees are familiar with and comply with the Code of Conduct.

#### 2. FAIR AND CONSIDERATE INTERACTION

- (1) Consideration of each individual's personal rights and the social standards of our company are the basis of our cooperation. This applies within our company as well as towards our business partners and customers.
- (2) Each employee is responsible in his/her area of competence and sphere of influence for ensuring that the personal rights of each individual employee and the social standards of our company are not violated.
- (3) We maintain a culture of cooperation based on a spirit of partnership and considerate interaction among all employees, business partners and customers.
- (4) We protect the right of freedom of opinion and freedom of expression. We attach importance to a climate of openness, in which employees can also express critical observations.

### **3. PRINCIPLE OF EQUAL TREATMENT AND INTEGRITY**

- (1) All employees have the right to respectful, courteous and fair treatment by superiors and colleagues. No one may suffer discrimination, be mobbed or prejudice be caused to them without objective reason on account of their race, colour, nationality, ethnic origin, sex, belief or world view, political opinion, age, physical constitution, sexual orientation, appearance or other personal qualities.
- (2) We are all obliged to respect the privacy and integrity of our colleagues and employees. Harassment and any form of unwelcome physical contact are unacceptable.

### **4. HUMAN RIGHTS, LABOUR AND SOCIAL STANDARDS**

- (1) It is the aim of SAFECEM that all employees act in conformity with internationally accepted human rights and material labour and social standards.
- (2) SAFECEM is committed in particular to the abolition of all forms of child and forced labour, the principle of non-discrimination, the recognition of freedom of association, collective bargaining and appropriate working conditions, especially working hours and paid holidays as well as access to adequate medical care and health insurance.

### **5. OCCUPATIONAL HEALTH AND SAFETY**

- (1) SAFECEM is aware of its responsibility for the health and safety of its employees at their workplace and shall take the best possible precautions against the risks of accidents.
- (2) Each individual bears joint responsibility here to support the company in its endeavours to create safe working conditions. Each employee must devote his/her continuous attention to occupational health and safety.

### **6. BUSINESS RELATIONS WITH DISTRIBUTORS AND OTHER BUSINESS PARTNERS**

- (1) We maintain fair business relations with our distributors and other business partners based on a spirit of trust and vice versa we expect our distributors and other business partners to treat us with the same respect and the same integrity which we show them.
- (2) We act in conformity with applicable laws and regulations. Furthermore, we endeavour to bind our suppliers to compliance with our Code of Conduct or a comparable code of conduct and we prefer to work together with environmentally and socially responsible suppliers.

## 7. BUSINESS RELATIONS WITH CUSTOMERS

- (1) Satisfaction of our clients is deemed our most valuable asset because this is the basis of our lasting business success.
- (2) It is our corporate goal to meet the needs of our customers by providing appropriate and efficient solutions. This includes continuous examination of our product and service portfolio and its proactive adaptation to new market requirements. It also includes knowledge sharing on best practices and providing training to our customers.

## 8. ANTITRUST LAW AND FAIR COMPETITION

- (1) Fair competition is a precondition for free market development and related social benefit. Accordingly, the imperative of fairness applies as well to the competition for market shares.
- (2) We undertake to comply with the respectively applicable legislation in antitrust law and competition law and not to gain any unfair advantages for ourselves over customers, suppliers and competitors. We expressly reject the gathering of competitive intelligence as a means of unfairly obtaining information about our competitors. Likewise, we do not disseminate any false information about the products and services of our competitors nor do we otherwise unfairly attempt to gain competitive advantages.
- (3) We shall also not accept informal discussions or arrangements which enable a restriction of competition.

## 9. COMBATING CORRUPTION - DEALING WITH GIFTS AND BENEFITS

- (1) We pursue a fair and honest business policy in conformity with the law, in which there is no place for bribery and corruption. For every individual, this means neither offering nor granting anyone unjustified advantages in connection with business activities, namely neither as cash payments nor in the form of other services. This applies irrespective of any different customs and practices in other countries.
- (2) We shall not, therefore, in principle distribute or accept gifts and invitations and we shall avoid conflicts of interest. Exceptions shall apply only in the case of generally common occasional or promotional gifts, the acceptance of which is a matter of courtesy. The same applies to invitations. Cases of doubt must be clarified with the employee's superior and/or the management.
- (3) All employees are required as a matter of urgency when dealing with such "advantages" at all times to examine themselves critically as well and to consider the impact of arrangements with business partners and public officials on outsiders or in particular how they could be assessed by investigating authorities.
- (4) When dealing with business partners and public officials in particular, it must be considered that many forms of conduct are prohibited or are even a punishable offence.  
Key precondition for criminal offences is the granting of an unlawful "advantage". Advantage is deemed in principle to be any betterment of the business partner or public official e.g. through the granting of gifts, cash payments or the like if the business partner or public official is not entitled to such advantage.



Third-party advantages as well, i.e. the granting of an advantage not directly to the business partner or public official but e.g. to his/her family members or company, are prohibited by criminal law. Furthermore, it must be considered that the granting of an advantage does not actually have to occur. The offering of such advantage or allowing such advantage to be offered is sufficient for making an action a punishable offence.

- (5) The following “advantages”, which are granted or organised by third parties in connection with a professional activity, especially when purchasing goods or commercial services, are, for example, always problematic respectively give rise to suspicion:

- Staff outings, specialist conferences, travel, entertainment;
- Gifts and/or other invitations;
- Bonus accounts or other reductions which are set up for purchase orders by business partners;
- Private advantages (also e.g. for relatives of employees) which are granted by a business partner;
- Financed private/personal further training, travel or events;
- Fees for projects without scientific value (fictitious research);
- Resources for uses prohibited by law or immoral uses.

## 10. PREVENTION OF CONFLICTS OF INTEREST

- (1) We expect that the personal interests of employees do not conflict with the interests of the company. Each employee must notify his/her superior of any personal interest which could exist in connection with the performance of his/her official duties.

- (2) No employee may manage a company or work for a company that competes with SAFECEM and may not pursue any activities that compete with SAFECEM. No employee may engage in a secondary employment which could constitute a competitive situation for SAFECEM.

## 11. DATA PROTECTION

- (1) SAFECEM undertakes to respect the privacy and integrity of its employees and business partners.
- (2) The protection of the personal data of our business partners, customers and employees and the respect of existing data protection regulations are paramount requirements for us. All personal data are processed exclusively for the specific purpose, comprehensibly, carefully and in accordance with the respectively applicable data protection laws.
- (3) We also align our entrepreneurial activities to ensure that personal data are protected against access and unlawful use by unauthorised persons.

## 12. COMPANY PROPERTY AND PROTECTION OF BUSINESS SECRETS

- (1) Each of us must handle company property responsibly and protect SAFECEM's assets against loss, damage, theft, misuse and unauthorised use. Also intangible assets such as in-house knowledge, intellectual property rights and works protected by copyright are company property.

- (2) Business secrets and other sensitive information must be treated confidentially. Any person who has access to such business secrets may use them only for business purposes and in particular may not disclose them to third parties (e.g. also not to relatives or friends).

### 13. ENVIRONMENTAL PROTECTION

- (1) Conservation of resources and environmental protection are the major challenges of our times. Alignment of our entrepreneurial activities to the requirements of environmental protection is, therefore, a matter of principle for us. Compliance with the respectively applicable legal regulations relating to the environment is a fundamental condition for this.
- (2) SAFECEM has made environmental protection a particularly high priority in the company. For this reason, SAFECEM has committed itself to the Guidelines of Responsible Care® and Product Stewardship and is working continuously on the development of innovative and improved business models and services for the use of chemicals in different industries and applications.

### 14. CONFLICT CULTURE AND THE HANDLING OF COMPLAINTS

- (1) SAFECEM lives and practices an open, fair and respectful culture in respect of criticism and conflict.
- (2) Every employee who has a concern or a complaint concerning the points specified in this Code of Conduct, including any breach of the Code, should refer the matter immediately to his/her superior. If this course cannot be considered, concerns and complaints can be addressed to the HR Manager, the management or anonymously via our whistleblower system. All management staff are responsible for providing assistance in this respect.
- (3) All information shall be discussed confidentially, if requested anonymously, with the HR Manager and, if applicable, with the management and followed up in the appropriate manner.
- (4) Informers shall suffer no disadvantages as a result of information given to the best of their knowledge and belief unless they have themselves violated applicable rules of conduct. SAFECEM does not tolerate reprisals due to complaints which are made in good faith within the framework of this Code.