

CODE OF

# CONDUCT

MicroChemicals GmbH

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- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11

FOREWORD BY THE MANAGEMENT	Page 5
WHO DOES OUR CODE OF CONDUCT APPLY TO?	Page 6
CORPORATE PHILOSOPHY AND PRINCIPLES	Page 7
WHAT IS YOUR RESPONSIBILITY?	Page 9
OUR BEHAVIORS	Page 10
OCCUPATIONAL HEALTH AND SAFETY	Page 12
ENVIRONMENTAL PROTECTION, SOCIAL RESPONSIBILITY AND THE USE OF RESOURCES	Page 13
IT SECURITY AND USAGE	Page 16
PROTECTION OF ASSETS	Page 18
DATA PROTECTION AND RISK MANAGEMENT	Page 19
CLOSING REMARKS	Page 21



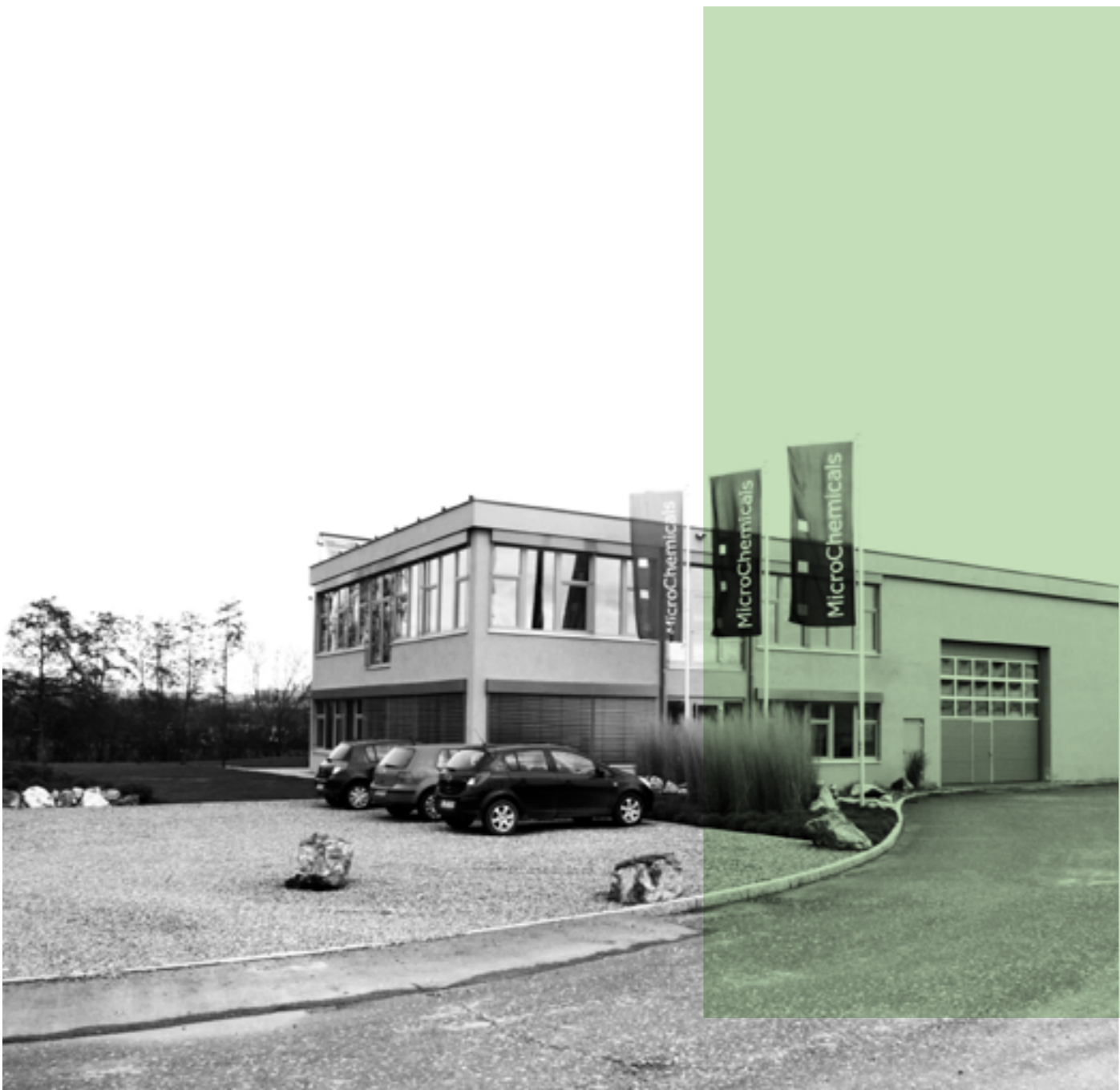
## FOREWORD BY THE MANAGEMENT

This code of conduct is intended to be the basis for our decisions. It should support and protect our corporate philosophy and the values of our company and should help to ensure that **MicroChemicals GmbH** is a good employer for our employees and a good supplier for our customers, but it should also strengthen the sustainability of our company.

Adherence to the central values of our company is not optional, it is a requirement of our employees, management and our suppliers and service providers. We would therefore like to ask you, as an employee, manager, supplier and service provider, to read our code of conduct and act accordingly. It will help us to maintain our performance in competition, to maintain our reputation as a good supplier and to contain cost risks.

See the Code of Conduct as a guide to help you make ethically correct decisions. If you are unsure whether a decision complies with the Code of Conduct or not, please coordinate your decision with the management.

Let us work together to make our company a little more exemplary every day: inwardly, in dealing with colleagues, outwardly in dealing with our customers, we do not forget the careful use of the environment and the sustainable use of resources.



Dr.-Ing. Titus Rinke



Dr.-Ing. Christian Koch



**How do we define our company philosophy and our entrepreneurial principles?**

Sincerity, friendliness, esteem and respect for colleagues, employees, superiors, customers and suppliers are core requirements for every team member. The fulfillment of this requirement, which at first glance seems simple, helps us to keep our employees motivated to be able to meet our customer requirements. A friendly and respectful togetherness also helps to keep the error rate at a low level. It goes without saying that any kind of bullying, exclusion, xenophobia, sexism not only have no place in the house, but on the contrary, in the company MicroChemicals it is strongly condemned and also persecuted and sanctioned.

Anyone who decides to work for **MicroChemicals GmbH** must not include bullying, marginalization, xenophobia and sexism in their actions, and even more, everyone who experiences bullying, marginalization, xenophobia and sexism in the company has the obligation to oppose and to report such incidents to the line manager.

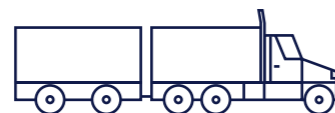
We are judged by our behavior. A good assessment of our employees by our customers is one of the most important success factors of our company. A violation of the principles of our company such as insincerity, rudeness, disregard and disrespect therefore massively endanger our business basis and thus also the workplace of ourselves and that of all colleagues.

# WHO DOES OUR CODE OF CONDUCT APPLY TO ?

This code of conduct applies to all employees, to our temporary staff, trainees for any temporary workers and also to the management in the same way. We also try to ensure that our suppliers and service providers base their actions on this or a similar code of conduct.



Manufacturer



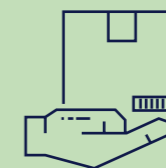
Forwarder



Distributor and Partner



Shipping Partner



Deliverer



End User

**HONESTY, APPRECIATION,  
KINDNESS AND RESPECT**

**WE ARE NOT ONLY RESPONSIBLE FOR WHAT WE DO, BUT ALSO FOR WHAT WE NOT DO.**

*Molière*

## **WHAT IS YOUR RESPONSIBILITY ?**

- Follow our Code of Conduct, it gives you the guidelines within which you can develop in our company.
- You must be able to assess the risks and you must also know the tasks that are assigned to you entail. This is the only way you can make the right decisions.
- If you are unsure about something, seek advice.
- If you are confronted with violations of our Code of Conduct, please report these to your line manager. If, as a reporting employee, you are subject to retaliation, such retaliation is a very gross violation of the principles of our Code of Conduct and will be disciplined to protect you.
- If you violate the Code of Conduct, you can expect disciplinary action up to and including termination. Behavior that not only violates our Code of Conduct, but is simply illegal, can and will also result in criminal charges and corresponding reports to the authorities.



## OUR BEHAVIORS

We want **MicroChemicals GmbH** to be an attractive employer and we want to strengthen and protect our good reputation with our customers, suppliers and authorities. In order for this to be successful, everyone must adopt our central principles. This chapter is intended to define the standards of good behavior that you can expect from your colleagues and superiors and that your colleagues and superiors expect from you.



**OCCUPATIONAL  
HEALTH AND SAFETY**



**PROTECTION OF  
THE ENVIRONMENT**



**SOCIAL RESPONSIBILITY  
DEALING WITH RESOURCES**



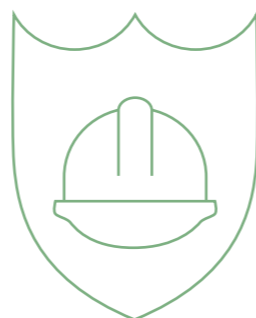
**BULLYING**

## OCCUPATIONAL HEALTH AND SAFETY

One of the most important goals is not to have any accidents in the company. The health of every employee is the most valuable asset that we have to defend. To this end, we try to minimize all security risks. In order for this to succeed, all employees are challenged. You should therefore use all safety devices in the manner intended for them. If you discover a security deficiency, report it or, if your expertise allows you, eliminate it. Often it is the little things that trigger major catastrophes in the chain of unfortunate circumstances. That is why you walk vigilantly through the company. If it smells strange without an explanation, it sounds strange or unusual, it can be something banal. But it can also be that a component

gets too hot and will soon start a fire or a fan hits its housing with the impeller and the sparks will ignite its surroundings in a few hours. These are just simple examples that should show that everyone can contribute to safety and health by simply being vigilant.

If you observe violations of occupational safety, please report them. Accidents at work are not only devastating for those affected and their families, they also endanger the performance of our company, e.g. through lost work. We won the Baden-Wuerttemberg state prize for occupational safety "Nobis" because we take on these issues. Please, we will continue to do so in the future, despite the prize won, in order to remain at the very high level. We will all benefit from it!



## ENVIRONMENTAL PROTECTION, SOCIAL RESPONSIBILITY AND THE USE OF RESOURCES

The protection of the environment is very important to **MicroChemicals GmbH** in many ways. As a company that deals in chemicals, some of which are dangerous, and that also has to store them for this purpose, there are strict legal requirements. Even in the event of an accident, the environment must be protected and, due to our storage, must not be damaged. In order to meet this goal, we have built in many barriers. The impounding basins are the first instance, the separation of the various fire compartments is another barrier, the specially coated floors are another and, as the last barrier, our large extinguishing water retention device in the event of an accident. However, these institutions are only able to fulfill their task if everyone adheres to the guidelines. If impounding basins are damaged or found damaged, this must be reported. Fire doors must not be blocked so that fires cannot spread unhindered. Inlets of our extinguishing water retention device must not be covered. As simple as it sounds, on a stack of paper lying on the floor you can not only slip, it can also cover the inlets of the extinguishing water retention device during an extinguishing process, so that these devices cannot fulfill their purpose and our company cannot protect the environment during an accident. As you can see, each and every one of us can help to achieve our goals through his or her behavior and help to avert damage to our company, our employees and our environment.



Companies are not only responsible for their employees and the environment, they are also subject to social responsibility. It is precisely the common good that defines life outside the company and that everyone rightly expects from society. Respect for and recognition of corporate social responsibility is an important principle.

For this reason, **MicroChemicals GmbH** supports a large number of projects. These are regional sporting events, support for regional projects to support disadvantaged children. But **MicroChemicals GmbH** is also involved internationally with the support of ten children and young people in India in Shantimalai. Through appropriate sponsorships, these children receive a school education that would otherwise have to help their parents in the field. We at **MicroChemicals GmbH** are convinced that such projects help to improve the situation of the disadvantaged and thus contribute to a little more justice in the world.





The worsening climate crisis clearly shows that “business as usual” is not a serious option for the future. The company **MicroChemicals GmbH** is therefore committed to climate protection in a special way:

The warehouse, laboratory and office space of **MicroChemicals GmbH** are manufactured in an extremely energy-saving design. This enables us to operate our building without oil or gas. What's more, we are one of the few companies with negative energy costs, even though we do not burn oil or gas. Due to our large PV system with 170KWp, our battery storage system with more than 150 KWh capacity and our solar thermal system with 22 KWp, we are basically energetically self-sufficient. We use a high-efficiency ground-water heat pump to heat our building and store the summer solar thermal surpluses in a large underground seasonal heat store with a mass of approx. 500t. For the individual few days on which we have to buy electricity in winter, we do this with green electricity. Overall, we sell many times more green electricity than what we have to buy from the grid, so that in addition to our (almost) self-sufficiency, we can provide other users of the grid with almost CO2-free electricity.

In order to meet our self-commitment to climate protection, we offer all our employees the opportunity to charge their electric car in the company parking lot with excess electricity free of charge, in order to enable them to make their way to work in a cost-saving and environmentally friendly way. Every employee has an obligation to at least think about an electric car for the way to work. We support every employee with information and the free charging facility that can help accelerate the switch to more climate-friendly mobility.

Our company car for regional business travel is an all-electric Renault Zoe. As an employee, you can also benefit from a „business bike“ or „e-bike“. **MicroChemicals GmbH** covers a large part of the costs. Cycling to work not only keeps you fit and healthy, it also helps to reduce your CO2-footprint.



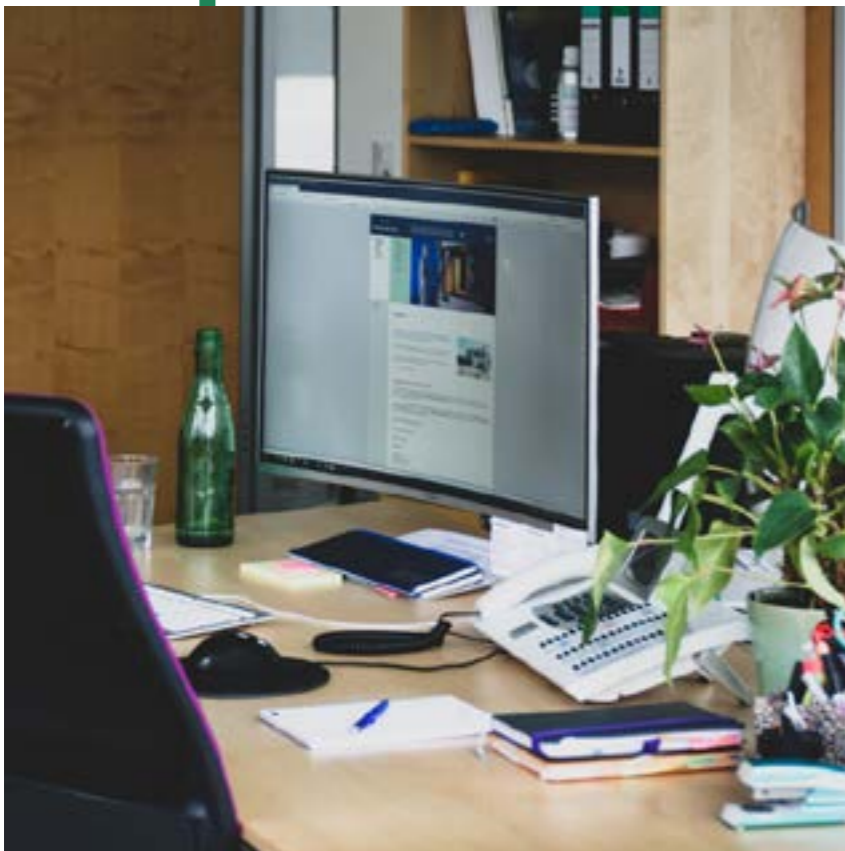
### ***Bullying:***

**MicroChemicals GmbH** does not tolerate bullying. We do not condone or accept acts or behaviors that are hostile, intimidating, or humiliating to others. Treat others with sincerity, kindness, esteem, and respect. Comments and also criticism must be expressed in an appropriate and respectful manner, this applies to the employees among themselves as well as between superiors and employees. Cultural differences must also be taken into account here. Jokes that, as everyone knows, make everyday life more cheerful, must not be at the expense of others. Report if someone is humiliating, intimidating, or disrespectful.



**MicroChemicals GmbH** operates many computers, networks and servers. This makes our day-to-day business easier, but unfortunately it also automatically creates security risks. The Association of the German Information and Telecommunications Industry had put the damage for the German economy in 2020 at a record value of 223 billion Euros. In order to prevent damage to our facilities, our employees and our customers, every employee who comes into contact with our IT, which basically affects all employees, is obliged to regularly participate in the IT security training courses offered and to comply with the IT security directives of **MicroChemicals GmbH**.

## IT SECURITY AND USAGE



- If you bring private devices with you that you want to connect to the company network, you must discuss the project with the IT manager in advance. You are not allowed to use personal e-mail accounts for business communication.
- You may not make the VPN access data accessible to third parties
- You may not change or deactivate any security settings on business IT devices unless you are instructed to do so by IT staff.
- You must limit your private use of electronic communication facilities (including private end devices), including social media, to a minimum during working hours. More than occasional and short use is not permitted. As a guideline, one minute of social media on private devices per working hour should not be exceeded. If self-regulation of social media consumption by the respective employee does not work satisfactorily, the ban on social media during working hours is a possible consequence for the employee concerned.
- When using MicroChemicals communication facilities, you may not access, send, save or post any pornographic material or any other form of provocative or offensive material. In addition, you must not visit any gambling site or engage in any other illegal activity.

➤➤ **THE STATUS OF IT SECURITY  
CAN BE COMPARED TO A VISIT  
TO THE DENTIST, BECAUSE  
PREVENTION IS BETTER THAN CURE.**

*Damian Izdebski*

## PROTECTION OF ASSETS

**MicroChemicals GmbH** has a wealth of assets that every employee must protect. They form the basis of every job in our company. Assets can be physical, electronic, financial or intangible. Whether it is part of a building, a server or a piece of technical equipment, **MicroChemicals GmbH** expects every employee to treat our assets with care. You must protect our assets from loss, damage, waste and misuse. If you become aware of loss, damage, waste or misuse, you must report it to management or your supervisor.

**MicroChemicals GmbH** uses and processes data for the efficient provision of our products and services. Communication via data networks has become an indispensable part of today's business world. Nevertheless, considerable risks arise from the processing and use of data. Furthermore, a lot of data, especially personal data must be protected in accordance with European and national laws, in particular the DSGVO, must be protected.

Personal data is basically any information about an identified or identifiable individual, such as name and contact details. Data of a more private nature (such as ethnic origin, sexual orientation) are sensitive personal data and are therefore subject to even stricter protection. We can and will only process and store data for legitimate purposes. This data must be protected from unauthorized access and misuse.

Non-compliance can cause harm to individuals. It can also result in fines and damage to the **MicroChemicals GmbH's** reputation, which may be damaged.

You must not disclose any personal information. If this is necessary for a project or service, you must consult with our Data Protection Officer. When personal information is no longer needed, it must be deleted. As a member of our staff, you will be required to sign and abide by Confidentiality Statement and attend annual training on the subject.

**MicroChemicals GmbH** builds its relationships with customers and business partners on trust. We want to maintain and further improve our good reputation. For this reason, you should never accept or pay bribes or kickbacks. Even mere allegations of bribery or corruption can damage our reputation.

You may not offer, give, demand, or accept any personal payment, gift, or favors in return for preferential treatment or to obtain a business advantage. You must not let anyone else do this for you. You must report corrupt behavior. Anyone or **MicroChemicals GmbH** itself can be held responsible for the concealment of a suspicion of bribery or corruption.

Preventing money laundering is a matter of course for **MicroChemicals GmbH**. Money laundering occurs when assets are concealed by legitimate business dealings or when criminal activities, including terrorism, are supported by legitimate means. All companies, including **MicroChemicals GmbH**, are exposed to this risk of being abused in this way.

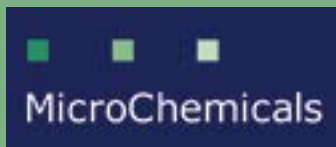
You have to comply with all due diligence obligations laid down by **MicroChemicals GmbH**, **MicroChemicals GmbH** must know with whom it does business. Important building blocks here are our internal export control documents (iECDs), our new customer end-use declarations (nEUDs) and the restriction of the sale of our products and services to verified, business actors with proper and proven business registration. If you have any doubts about the legality of any deal, always report it to your supervisor or management.

## DATA PROTECTION AND RISK MANAGEMENT



## CLOSING REMARKS

Thank you for reading our Code of Conduct. It will help you to make the right decisions in critical situations, or to obtain help and advice or to coordinate with our specialist departments before a wrong decision is made. This helps to expand and maintain our good reputation of **Micro-Chemicals GmbH**, as well as to protect us from sanctions and damage. This also secures your workplace and the one of your colleagues.



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