

# Code of Conduct

for the companies of the Currenta Group

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In agreement with Currenta Geschäftsführungs-GmbH, Currenta Beteiligungen KG and the management boards of Chemion Logistik GmbH, TECTRION GmbH, NETCUR GmbH and Ausbildungsinitiative Rheinland GmbH (all of these together forming the companies of the Currenta Group, hereinafter referred to as the "Currenta Group"), the management board of Currenta GmbH & Co. OHG, as the management company of the companies in the Currenta Group, has issued the following Code of Conduct for employees of the companies in the Currenta Group:



# Introduction and our corporate self-image

## Foreword by the management board

We are committed to complying with legal, regulatory approval and normative requirements as well as internal and external binding obligations with due regard for ethical and social values.

Our actions are guided by our core values. Illegal behaviour, discrimination or violations of, for example, human rights or our other ethical values are not tolerated – without exception!

If a business transaction would only be possible if we were to behave illegally or violate our values, we will not pursue this transaction.

All our employees act in accordance with our values, with the objective of creating a culture that is based above all on mutual respect, trust and the values set out in this Code of Conduct. We also consistently require external parties, for example partner companies or those along the supply chain, to act accordingly.

We have set up a group-wide system for reporting violations of the guidelines and regulations, which is available not only to our employees but also to our customers and suppliers, among others. We take all suggestions and complaints very seriously, follow up on them and implement solutions.

## Compliance

This Code of Conduct forms an integral part of the Currenta Group's compliance programme. Its rules are binding for all employees of the Currenta Group. The rules of conduct laid down here are defined and explained in guidelines, where the obligations associated with the respective subject matter are also bindingly laid down. Violations of this Code of Conduct and the individual guidelines, and thereby the values and rules of our company, will not be tolerated.

## Canon of values

The Currenta Group demands of itself, its board members and its employees that it be a progressive and open-minded company in all respects. We endeavour to give our best for our customers every day, supported by a culture of fairness, tolerance and mutual respect. Our company participates in economic and social life as a customer, contractor and employer. At the same time, we are subject to various legal and regulatory rules and requirements. We provide our employees with a framework for this in the form of regulations (for example guidelines). Employees of the Currenta Group are accordingly informed of and trained in these principles and this Code of Conduct. Compliance with all laws and regulations is a top priority for us. The Currenta Group's understanding of values is essentially determined by the topics covered by the Code of Conduct:

### Conduct within the company and interaction with each other

- Fair and respectful working conditions in a non-discriminatory environment
- Promotion of diversity and inclusion in everyday work
- Protection of the property of the Currenta Group and the resources that are provided

### Integrity and behaviour for the Currenta Group in the course of business and all other activities

- Fairness in competition, no prohibited cartel arrangements
- Integrity in business transactions, no corruption – especially when dealing with customers and public officials
- Dealing with public statements relating to the Currenta Group

### Social and environmental responsibility in the Currenta Group and its supply chains

- Respect for and protection of human rights and environmental due diligence
- Protection of the health of our employees and prevention of accidents and injuries
- Negative impacts on nature and the climate must be reduced as much as possible

### Protection of company interests, secrets and personal information

- Decisions must be taken without conflict of interests and exclusively in the interest of the Currenta Group
- Documents and information of the Currenta Group must be protected against unauthorised access and loss
- Business operations must comply with data protection regulations

### Dealing with authorities

- Constructive cooperation with authorities
- Safeguarding of the legal positions and interests of the Currenta Group
- Dealing with and behaviour in the event of a search operation

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## Principles and rules of conduct

### 1 Conduct within the company and interaction with each other

Every individual within and outside our company with whom we come into contact in the course of our company's activities has the right to fair, respectful, courteous and indis-criminate treatment, regardless of their origin, gender, age, education, profession, religion, ideology, sexual orientation, physical and mental integrity, political views, position within our company or outside, and other backgrounds and circumstances.

The Currenta Group has a duty to ensure a safe, non-discriminatory and harassment-free environment for all employees and third parties. Any form of discrimination or harassment and disadvantage must be avoided, between employees as well as with regard to external parties, such as customers, suppliers, service providers, subcontractors and also public authorities. Every interpersonal action should always be scrutinised in terms of the impression it creates with the recipient.

We promote diversity and inclusion in our daily working life, support people with disabilities or limitations and create optimal working conditions characterised by respect and appreciation between colleagues. We are convinced that this attitude contributes to the success of our company.

The property of the Currenta Group and the equipment provided to employees must be treated with care and protected against damage, destruction and misuse. Operating resources and the services

provided by operating resources (for example Internet access) must always be used in the interests of the Currenta Group, as well as in compliance with the applicable law and existing third-party rights (in particular copyright and personal rights). We have internal guidelines that must be observed in this regard, for example on the use of e-mail and protection against third-party access to the IT infrastructure and data of the Currenta Group, as well as the personal information of our employees.

### 2 Integrity and behaviour for the Currenta Group in the course of business and all other activities

Based on the principles of free competition, compliance with national and international anti-corruption and antitrust law is of the utmost importance to the Currenta Group. Bribery and prohibited restrictions of competition are detrimental to prosperity and society as a whole. It carries with it considerable risk of fines, damages and loss of public image for the Currenta Group and for the individuals involved.

Corruption, particularly in the course of business, and agreements that restrict competition are prohibited and constitute criminal conduct. Even just the appearance of any unauthorised granting of advantages, acceptance of advantages, corruption and

anti-competitive agreements, in particular regarding markets, prices, quantities and conditions, must be avoided. Donations (including gifts and invitations) as well as business discussions with competitors are only permitted in accordance with the relevant guidelines.

All business activities, including cross-border transactions, may be subject to national and international restrictions or even prohibitions. The relevant guidelines and legal requirements must be observed. Failure to comply with such prohibitions can have serious consequences for the activities and continued existence of the Currenta Group.

Employees who represent and act on behalf of the companies within the Currenta Group vis-à-vis external parties must always behave in a professional manner consistent with generally accepted standards of decency when performing their duties. In addition, all employees are required to behave in this manner if they are perceived as representing the companies of the Currenta Group in a specific situation during as well as outside of working hours (for example when working on customer premises, attending trade fairs or social events, etc.).

It is essential for our public image that we present a uniform image to the outside world and only make truthful statements. Enquiries from the press, radio, television and other such media, including online media and so-called influencers, must without exception immediately be forwarded to the Currenta press department (C&M department). The same applies before any statements relating to the Currenta Group are made to media representatives.

Commitment to and support for political parties on behalf of the Currenta Group, as well as donations or other contributions, are subject to the relevant guidelines and company agreements. Reservations of consent must be strictly observed. The same applies to any organisation of political events on company grounds or in the company's business premises. It goes without saying that private political involvement remains unaffected, as long as it does not convey the impression of being a statement or activity on behalf of the Currenta Group or as an employee of the Currenta Group; if the interests of the Currenta Group are affected by such an activity, the relevant guidelines and works agreements as well as any existing reservations of consent must also in this regard be observed.

### 3 Social and environmental responsibility in the Currenta Group and its supply chains

Respect for human rights – including the protection of health and well-being – as well as protection of the environment within the Currenta Group and throughout the supply chain, starting with our suppliers and ending with our customers, is of paramount importance. The Currenta Group places high demands on itself and its suppliers, in terms of environmental awareness and behaviour as well as with regard to dignified and safe working conditions.

Slavery, child labour and violations of minimum wages, working hours and safety standards, as well as any other inhumane working conditions, are not tolerated – not in the Currenta Group and not with suppliers. The prevention of accidents and injuries as well as the health and well-being of our employees are a top priority for the Currenta Group. We offer workplace health measures and corresponding counselling services to promote and maintain health. Within the Currenta Group, this is ensured through guidelines and related training, as well as control, monitoring and documentation mechanisms. The Currenta Group has adopted a special Supplier Code of Conduct for suppliers.

The protection of natural livelihoods is of paramount importance to us. All actions of the Currenta Group and its employees are always scrutinised for being environmentally sound and are determined by the objective of minimising negative impacts on the environment and climate as far as possible, for example by protecting our natural resources and reducing greenhouse gases. We endeavour to reduce the impairment and consumption of natural resources to a minimum for the benefit of all – including future generations.

## 4 Protection of company interests, secrets and personal information

There is always a conflict of interest if a decision or action for the Currenta Group is not made freely and completely in the best interests of the Currenta Group, for example due to conflicting business or private interests. Such conflicts of interest can lead to disadvantages and losses for the Currenta Group, for example through unfavourable decisions or less than optimal actions. They can also adversely affect the trust third parties have in our company and the integrity of our employees, which could result in damage to our reputation and economic disadvantages for the Currenta Group.

All employees must always separate their private interests from those of the Currenta Group. Any action that is taken on behalf of the Currenta Group must always be in the exclusive interests of the Currenta Group, while putting aside private interests or the interests of third parties. Only objective criteria count, in particular when it comes to decisions concerning employees or business relationships with third parties. Even the mere appearance to outsiders of a conflict of interest must be avoided.

In the employee's own interest, conflicts of interest must be communicated to superiors in good time. This applies in particular to typical conflicts of interest, such as those arising from authorised secondary employment or due to personal concerns, for example in business relationships involving relatives or other related parties.

Documents and information of the Currenta Group must be stored and secured against unauthorised access and loss. This applies in particular to any work performed outside the company premises, including when working at one's home office or in public spaces. Confidential information, for example in the areas of Human Resources, Legal & Compliance and the management board, must be stored physically and electronically secure and may only be made accessible to those employees who require the information to fulfil a specific task, and only to the extent necessary (need-to-know principle). In view of existing statutory retention obligations, the deletion or destruction of information must

be agreed in advance with the responsible colleagues from Data Protection or Legal & Compliance.

The Currenta Group affords the protection of personal information high priority. All relevant business processes of the Currenta Group must be designed in compliance with data protection regulations. We consider this first and foremost to be part of our corporate responsibility towards the data subjects, but also as a way of minimising risk, as a breach of data protection law can be punishable with considerable fines and other consequences. For this reason, the companies of the Currenta Group do not process (i.e. collect, store, modify, transmit, block, delete, etc.) personal data unless full compliance with the applicable law has been ensured in advance. Under no circumstances may personal data be disclosed to third parties without prior assessment. The rights of the data subjects must be protected at all times. A standardised and consistently high level of data protection throughout the Group is ensured by complying with legal requirements and, in particular, internal guidelines on data protection. In cooperation with the data protection organisation implemented for this purpose, all employees ensure that data protection is practised throughout the entire Group.

## 5 Dealing with authorities

Like any other company, the companies in the Currenta Group regularly come into contact with authorities, for example in matters relating to tax, customs, business operations and in special situations such as incidents. We always work constructively and transparently with the authorities, while protecting our legal positions and our interests.

In the event of inquiries and requests from authorities outside of regular business operations and daily business, and in the event of unannounced visits, such as during searches or due to acute incidents, the relevant department – or, in case of doubt, the respective supervisor – must be informed immediately. Together with the management board and the Local Compliance Officer of the Currenta Group company concerned, the relevant competent department shall decide on further procedure and communication with the authorities. The guidelines for such cases provide assistance in dealing with the situation correctly and must be observed.

## Contact person, whistleblower system

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If you have any questions about this Code of Conduct and the guidelines referred to in it, you can contact your supervisor or the responsible Compliance Officer at your Currenta company at any time.

If you have any evidence of possible misconduct by employees of the Currenta Group in violation of this Code of Conduct, the guidelines referred to in it, other Currenta Group guidelines or legal regulations, or if you have any suspicions to this effect, you can report this to us at any time in the following ways – including anonymously via the whistleblower portal:

### NAVEX EthicsPoint

<https://secure.ethicspoint.eu/domain/media/de/gui/105668/index.html>

If you have information about possible misconduct by a business partner or a public authority, you can also contact the relevant reporting centres there directly.

On the initiative of the European Union, the legislator has created regulations for the protection of whistleblowers in companies; these protect the identity of whistleblowers and ensure that reports are promptly and appropriately addressed. The Currenta Group complies with these regulations unconditionally and we encourage all employees to report information about possible misconduct – for the protection of the individuals concerned and the Currenta Group itself.

