

THE
CODE
OF
CONDUCT

Concerning Donau Chemie Group's
internal and external affairs.

FOR A
BRIGHT
TOMORROW.



FOREWORD

by the board of managing directors

Donau Chemie as an international company complies with applicable laws, promotes sustainable development and recognises and respects social and ethical standards. Our corporate culture encourages change and adheres to permanent values. In order to continuously act according to our corporate culture which is based on **trust, reliability, transparency and fairness**, we have drafted this Code of Conduct. It is intended as an orientation guide and an aid in your daily work.

This Code of Conduct which applies worldwide is binding on all our employees. It applies internally in day-to-day business as well as externally, during contacts with the general public and institutions of all kind. The Code of Contact follows the **cultural and legal frameworks** of all the countries where Donau Chemie

operates. It applies even if local laws and practices do not match its standards. If local laws and practices exceed our requirements we shall adhere to these and **adjust our Code of Conduct accordingly**.

We shall not tolerate violations of this Code of Conduct and shall take appropriate measures in response to such breaches.

The Code of Conduct can only work if we all follow its provisions. Therefore, Donau Chemie expects each employee to **follow and implement** this Code of Conduct. This is the only way for us to foster trust and stand up for our corporate culture in order to secure the long-term success of our business.

»WHEN WE ALIGN OUR
BEHAVIOR ACCORDING TO
ETHICAL RULES, WE CAN
COPE WITH THE
VICISSITUDES OF LIFE.«

Dalai Lama



Mathieu de Krassny
Mathieu de Krassny MSc
Board Member



J. Schober
Dipl.-Ing. James Schober
Chairman of the Board



Richard Fruhwürth
MMag. Richard Fruhwürth
Board Member

Code of Conduct concerning Donau Chemie's EXTERNAL AFFAIRS

CONDUCT TOWARDS CUSTOMERS, SUPPLIERS, CONSULTANTS AND PUBLIC AUTHORITIES

Together with our business partners we work on made-to-measure, future-oriented service- and logistics concepts. In doing so we express **our responsibility and respect towards our customers and suppliers** through our flawless products and services. Furthermore, we see it as our duty to constantly evaluate our performance and adjust to market requirements.

We treat our suppliers and consultants with fairness. We involve them actively in complying with our Code of Conduct so that our business partners can rely on a continuous commitment. Decisions concerning our customers are based solely on criteria such as quality of products or services, reliability, best cost-to-performance ratio and adherence to an obligatory Code of Conduct.

We **co-operate with and treat public authorities** in an open manner. We refrain from any activities that could unlawfully influence governmental decisions.

FAIR COMPETITION

Donau Chemie adheres to **fair contracts and fair competition**. Just as we conduct our business properly, i.e. ethically and lawfully, we expect the same of our business partners.

Donau Chemie does not make any price-, condition-, market segmentation-, market share- or customer segmentation arrangements with its business partners or competitors. Donau Chemie refrains from any informal talks or "gentlemen's agreements" to

exert influence upon competitors or anyone else. Donau Chemie does not exchange information with competitors on calculations, capacities, plans, customer relations, prices, planned price changes or costs.

CONFLICTS OF INTEREST, BENEFITS, CORRUPTION, BRIBERY

All employees at Donau Chemie must **avoid conflicts of interest** that stem from relations with customers, suppliers, consultants and public authorities. This may include conflicts of interest that are personal or family-related if concerning customers, suppliers, consultants and public authorities. Donau Chemie supports **worldwide anti-corruption efforts** and firmly stands up against all corruption attempts in all areas of the business and in all countries. This applies to internal work as well as to dealings with business partners and public authorities.

No Donau Chemie's employees or sub-contractors must indirectly offer bribes (money, gifts or other monetary or non-monetary inducements), promise, grant, accept or ask for such bribes. Donau Chemie does not participate in any business that is under suspicion of corruption. **Bribery demands** made on employees of Donau Chemie have to be instantly rejected, documented (compliance@donau-chemie.com) and reported to the superior.

Even outside their job-related activities, employees of Donau Chemie are **not permitted to accept benefits** that might affect their job-related actions ("inducement"). Invitations or small gifts may be accepted if they are within a certain limit and do not affect job-related objectivity.

DONATIONS

Donations have to be approved by the management board and have to be lawful. They may only be granted to charitable organizations.

INSIDER KNOWLEDGE

The integrity of Donau Chemie and of its business partners has to be protected. This is why no information must be forwarded that derives from job-related advance of knowledge. No insider knowledge of plans and facts of Donau Chemie or its business partners that have not been made public may be disclosed by either employees or sub-contractors – internally or externally.

Employees and sub-contractors may not disclose special knowledge of products to project participants or third parties without explicit permission of the management board.

SOCIAL RESPONSIBILITY

Donau Chemie is well aware of its responsibility towards employees and contract workers in all countries. Donau Chemie voluntarily adheres to the international **social standard SA 8000** (Standard for Social Accountability) which does not permit child-, compulsory- or bonded labour, but regulates minimum standards of health safety and work security. Furthermore, SA 8000 allows

the establishment of the trade unions, permits no discrimination, tolerates no corporal or psychological punishment and regulates work time restrictions and a decent wage level. As long as the local government does not demand a higher age limit, employment of minors is illegal. Employees under the age of 18 are **not allowed to perform dangerous work** and have to be spared from night-time work to allow education.

PROTECTION OF THE ENVIRONMENT

Donau Chemie actively engages in **protecting the environment and its sustained development**. We ensure that neither we nor our suppliers evade environmental regulations and that resources are being protected and utilized efficiently.

FAIR COOPERATIONS WITH SUPPLIERS

Our suppliers see Donau Chemie as a competent, reliable and fair partner. **Donau Chemie's worldwide standards, framework contracts and standardized agreements** are the foundation of a trust-based cooperation. Procurement and assignment of offers and choice of suppliers is always based on transparent and comprehensible criteria and processes. Donau Chemie chooses innovative and efficient suppliers with **a view to long-term cooperation**. Our suppliers are supported by us in their further development. Donau Chemie expects the same from its suppliers.

Donau Chemie only places orders with sub-contractors and suppliers that **commit themselves to following** the Code of Conduct governing Donau Chemie's external relations and adhere to social standard SA 8000.

DONAU CHEMIE'S STANDARDS REQUIRED OF SUPPLIERS

In addition to the aforementioned regulations Donau Chemie requires its suppliers to adhere to the following regulations:

Salaries and wages including overtime pay and miscellaneous efforts in the suppliers' companies have to comply with legal regulations and collective bargaining agreements or even exceed them.

Personal dignity, privacy and personal rights of human beings have to be respected. Corporal punishment, physical, psychological, sexual or verbal harassment, denigration or abuse are forbidden.

Even if the legislator regulates the maximum number of hours and provides for exceptions, a 48 hours working week (or 60 hours with overtime) may not be exceeded at the suppliers' companies. Employees must be granted one day off per week except for exceptional cases.

Suppliers have to ensure **a safe and healthy working environment** in order to avoid accidents and injuries at work. The supplier has to respect the employees' rights of freedom of assembly, freedom of association and collective bargaining. The supplier must **observe environmental regulations** and standards that apply to his business and implement environmentally sound procedures and techniques throughout the entire business.

SUPPLY CHAIN

Suppliers must obligate their sub-contractors to follow Donau Chemie's Code of Conduct.

SANCTIONS AGAINST SUPPLIERS AND SUB-CONTRACTORS

Violations of this Code of Conduct may result in an **immediate cessation of the business relationship**. Donau Chemie hereby reserves the right to refrain from all contracts and commissions without having to suffer any adverse consequences of the foregoing.

AUDIT

Donau Chemie reserves the right to verify adherence to the Code of Conduct.

»IT IS OUR CHOICE OF GOOD OR EVIL THAT DETERMINES OUR CHARACTER, NOT OUR OPINION ABOUT GOOD OR EVIL.«

Aristoteles

Code of Conduct concerning Donau Chemie's INTERNAL AFFAIRS

FAIRNESS AND RESPECT TOWARDS EMPLOYEES

Donau Chemie is aware of its responsibility towards its employees. Donau Chemie expects each member of its staff to act for the company's good and to associate with colleagues and third parties in a **friendly and fair manner**.

Cultural and human diversity is a cornerstone of Donau Chemie's system of values. None shall be discriminated against on account of gender, sexual orientation, political convictions, origin, race, age, birth, religious belief or any disability. None shall be disadvantaged, abused, discriminated against, molested, sexually harassed, excluded and suspected of any wrongdoing without reason or subjected to mobbing. Dignity, personal rights and privacy must not be violated. Conflicts must be settled fairly by the managers. All contacts among employees must be based on **trust and open communication**.

EMPLOYEE DEVELOPMENT AND EMPLOYEE PROMOTION

Our employees' development and promotion are crucial for their personal and business success as well as for Donau Chemie's success. Therefore, superiors are urged to interview their staff in order to comment on their work and set measures for their further training. Employees will in return receive an opportunity to **express their views regarding adherence** to the Code of Conduct, their work environment, their own and their superior's performance.

Donau Chemie encourages its staff to accept offers from their superiors regarding their professional and personal development. Donau Chemie also stands up for improving disabled persons' work situation and enables them to qualify for and work at appropriate workplaces. Donau Chemie welcomes and supports its staff's **social engagement** whenever operationally possible.

GENERAL PLANT SAFETY

The staff's safety is a major concern for Donau Chemie. All staff members are individually instructed by their superiors in the safety rules in force. The managers are role models as far as cautious behaviour is concerned in order to create a safer workplace. Risks that have already been recognized or considered possible – due to the handling of Donau Chemie's products or services – must be reported without delay to the **superiors and to the quality manager**.

PROTECTING KNOW-HOW AND RESEARCH RESULTS

Knowledge is of crucial value to Donau Chemie. This is why all employees are obligated to carry out and document their work according to the **best standards** and pass on their know-how properly. It is unacceptable to present other people's achievements as one's own. No employee may research and use third parties' secrets. Basically, information concerning third parties may **only be derived from generally accessible sources**. Trademark rights and licences of third parties must be respected. No employee may pass on internal secrets or confidential data of business partners to third parties. Procedures and techniques must be kept secret under all circumstances.

USE OF CORPORATE PROPERTY AND DATA SECURITY

The use of the IT infrastructure and application programs provided by the company must be confirmed in writing by all members of the staff and agreed upon by the work council and the Chamber of Labour in an IT guideline.

NOTIFICATION DUTIES AND SANCTIONS

Each and every employee is expected to immediately and fully report to their superiors any violations of this Code of Conduct. Such reports may be made verbally or in writing. If the employee fears disadvantages for themselves, the report can also be made by a trusted person or the anonymous whistleblower system can be used.

Employees who report identified **violations of laws or serious misconduct** against this code of conduct in "good faith" (= **whistleblowers**) will in no way suffer negative consequences (disadvantages, discrimination).

Every manager must organize his area of responsibility in a way that notifications of foreseeable or already existing violations of the Code of Conduct reach him immediately. Supervisors must **regularly talk to their employees** in order to check compliance with the code of conduct as a preventive measure.

Violations of this Code of Conduct may result in **disciplinary measures** proportionate to the seriousness, including consequences provided under labour laws and may result in civil proceedings and criminal prosecution.

EVALUATION OF EFFECTIVENESS

Donau Chemie **verifies at regular intervals** whether the regulations and principles set forth in the Code of Conduct are being adhered to. In the course of internal reviews employees are interviewed, documents reviewed and sites visited.

COMMITMENT

This Code of Conduct constitutes the basis for the cooperation within Donau Chemie and represents the **values, rights and obligations** of the employees in internal and external affairs. We expect all our employees to take this as a guideline and apply it in business. Managers acknowledge this Code of Conduct by their signature and are furthermore responsible for informing their employees about its contents.

CONTACT PERSONS

Only a cycle of **learning, recognition, understanding** and application brings the Code of Conduct to life. Questions will arise time after time.

In the event of questions, proposals or doubts concerning the Code of Conduct please approach your contact person at Donau Chemie; these are, in particular, the employees' superiors. If no clarification can be obtained this way, please use the following e-mail address: compliance@donau-chemie.com or the **whistleblower system**.

»COURAGE
IMAGINES SHORTER
PATHS.«

Johann Wolfgang von Goethe

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