

CUSTOMIZED
SOLUTIONS



Code of Conduct

Schill+Seilacher GmbH

Preamble

Schill+Seilacher GmbH at Böblingen is a manufacturer and distributor of highly specialised chemical process additives.

Since 1877 our group of companies has been committed to the highest standards in all areas of our business activities. Our owner, the Ingeborg-Gross Foundation, continues the tradition of values that we have lived by as a family business in the past, aware of the mission given to us by Mrs. Ingeborg Gross and the promise made to her.

Since January 2020 we are participant of UN Global Compacts. Issues, such as compliance with labour and human rights, health and safety of our employees, environmental protection and ethical business practices are a fundamental obligation for us.

We have laid down our ethical, social and ecological standards in this Code of Conduct, which we expect to be observed by all our employees.

We also make this demand on our suppliers. As a bedrock for lasting and trusting business relationship, we expect them to adopt our principles of conduct and to apply them to their own corporate policy.

Our code of conduct serves to regulate, communicate, observe and uphold in a binding manner the basic principles of human coexistence and work for everyone working with and for Schill+Seilacher GmbH. Comprehensive and ongoing trainings are provided with regard to its content, meaning and purpose. Our site management also regularly reviews the code and if necessary makes amendments and clarifications in collaboration with the work council.

On the following pages you find all aspects, which are important for observance and realisation of the Schill+Seilacher group code of conduct.

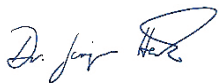
The provisions apply consistently to all enterprises of the Schill+Seilacher group. As far as referred to Schill+Seilacher group in the following, this means that the provision also mandatory applies to all employees in particular of the Schill+Seilacher GmbH, Böblingen, Schill+Seilacher "Struktol" GmbH, Hamburg, Schill&Seilacher Chemie GmbH, Pirna and Struktol Company of America LLC, Ohio.

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1. Labour and Human Rights

Schill+Seilacher GmbH safeguards all national and international labour and human rights and is compliant with all agreements and conventions concerning appropriate working conditions, employment and behaviour, which have been signed by the European Union (EU), the International Labour Organisation (IAO) and the United Nations (UN).

1.1 Free choice of employment

Employment with Schill+Seilacher GmbH is a free choice. Forced labour, debt bondage or involuntary prison labour as defined in ILO Conventions Nos. 29 and 105 will be rejected. Employees are not forced to work under threat of physical injury or any other form of coercion. They are not required to deposit their identity documents or any other pledge before starting work.

Employees are therefore only hired if they choose this on an entirely voluntary basis. They are free to terminate their employment.

The term „employee(s)“ refers in this case to permanent employees, trainees, interns, and temporary workers.

1.2 Child labour and underage workers

On the basis of ILO Convention Nos. 138 and 182 the development of children should not be inhibited. Their dignity must be respected and their safety and health should not be compromised.

Under national law, minors seeking employment may no longer be subject to compulsory schooling, i.e they must have attended a mainstream school for at least nine or ten years (depending on the federal state). According to the German Youth Protection Act, minors may not be employed for night shifts or in dangerous conditions.

Schill+Seilacher GmbH observes all regulations concerning the minimum age for admission to employment.

1.3 Anti-discrimination

In compliance with the ILO Conventions Nos. 100 and 111, Schill+Seilacher GmbH does not tolerate any form of discrimination in recruitment, remuneration, further training, promotion and termination of employment.

Discrimination or favouritism on the basis of ethnic origin, nationality, colour, gender, age, religion, sexual orientation, marital status, mental or physical disability, social origin, political opinion or trade union membership is strictly prohibited. For Schill+Seilacher GmbH this is ensured by means of an established complaint point.

1.4 Fair and appropriate treatment

Schill+Seilacher GmbH promotes and supports mutual respect, understanding and trust between all employees and managers. Interaction with each other is open and honest and characterised by a sense of responsibility for each other. The working environment should not be affected by harassment. Any unwanted verbal or physical conduct (such as physical discipline, sexual abuse, verbal abuse) that unreasonably interferes with a person's job performance or that creates an intimidating, hostile or offensive work environment is strictly prohibited.

1.5 Wages, salaries and working hours

All employees of Schill+Seilacher GmbH receive written and comprehensive information on their working conditions with regard to wages/salaries and working hours prior to taking up employment.

Wages and salaries comply with national statutory requirements and the customary industry standard. Our wages and salaries are sufficient to cover basic needs and guarantee disposable income. Wage deductions as a direct or indirect disciplinary measure are prohibited.

We comply with national regulations and agreements on working hours and regular paid vacation.

1.6 Freedom of association

Without exception, employees of Schill+Seilacher GmbH have the right to join a trade union, to form collective workers' representations and to conduct collective negotiations through a workers' representation to regulate working conditions. They need not to fear any restrictions or consequences.

The company's management and worker's representations work together constructively and in a spirit of trust. Even in contentious disputes, the aim remains to permanently maintain sustainable cooperation.

Workers' representations are not discriminated and are allowed to carry out their representative tasks at the workplace.

1.7 Privacy protection

Schill+Seilacher GmbH undertakes to protect privacy and personal information of its employees, customers, suppliers and other persons with whom the company has a business relationship.

Personal data is collected, used and stored in accordance with applicable data protection laws and only for company purposes, to the minimum extent necessary.

2. Health and occupational safety

In the interest of all employees, occupational safety, health protection and the safety of facilities are top priorities of Schill+Seilcher GmbH. Hazard-free and safe working conditions are an essential prerequisite for achieving our goals in the areas of quality and environment.

Within this framework, we fulfil our statutory obligations and also work together with workers' representations, the authorities and insurance companies to continuously improve our occupational health and safety standards. Technical equipment and organisational measures ensure that the risks of accident for our employees, the neighbourhood and the environment are minimised. Recurring risk assessments result in continuous improvement of existing measures. Our occupational safety specialist and the fire safety officer also advise the management on how to improve the company's safety situation. Nevertheless, should an incident almost or actually occur, the situation will be analysed immediately and accident prevention measures will be taken. As far as feasible, technical and organisational solutions have priority over personal protection measures.

2.1 Health protection

We ensure that our employees work in a safe and healthy environment. Our highest priority is to substitute any chemical and physical risks or to minimise them by technical measures.

Furthermore, good education and regular training reinforces the level of awareness of our employees with regard to occupational safety. This enables each individual to recognise dangers in good time, to report them and not to endanger him/herself or others through their actions. If hazards cannot be completely excluded, every employee will receive personal protective equipment suited to their activities.

Preventive occupational healthcare, which is provided by our company medical service, also contributes to the early detection and prevention of work-related illnesses, maintaining employability and further developing occupational health protection.

2.2 Handling hazardous substances

Hazardous substances are one of the main hazards in the chemical industry. Therefore, when developing new products and optimising our existing products, we check whether less hazardous substances can be used. Contact with hazardous substances is excluded or minimised as far as possible through technical measures. Appropriate storage and labelling contribute to further risk minimisation. Employees who work with hazardous substances are trained with regard to their risks and how to behave in case of accidents. Appropriate operating instructions are available for every activity involving hazardous substances.

Safety data sheets, which are freely accessible to all employees, are available for every activity involving hazardous substances. Safety data sheets are available for every raw material, supplies, every laboratory chemical, commodity and for all our finished products

2.3 Plant safety

Safe plant operation is deemed extremely important in our company and is given priority over commercial interests in the event of potential hazards inside or outside the company premises.

New plants or modifications to existing plants are systematically planned, professionally installed and operated by qualified personnel. All plant components are classified according to their safety-related importance; safety-relevant plant components are secured against unauthorised access.

Safety equipment and protective devices are always kept in a technically flawless condition. A service and maintenance plan ensures the regular inspection and maintenance of these facilities.

3. Environmental protection

Management and employees of Schill+Seilacher GmbH are fully aware of their responsibility with regard to environment and nature. Our environmental awareness goes far beyond the fact that we comply with all applicable laws, regulations and official requirements.

In order to avoid disruptions with consequences for the environment and occupational safety, we have created an extensive maintenance and repair programme for ourselves and drawn up an emergency plan that regulates the behaviour of all employees in the event of a disruption. In general, we are especially careful to keep the quantities of hazardous substances as low as possible.

Furthermore, since 2017 Schill+Seilacher GmbH introduced a certified environment management system DIN ISO 14001.

3.1 Environmentally friendly products

Water-based emulsions or dispersions are offered as alternatives to solvent-based products. Products which, if properly used by the customer, can enter wastewater or groundwater are classified into wastewater relevant levels in order to ensure professional removal.

3.2 Emissions and waste

Process-related emissions in the form of exhaust air and wastewater undergo thorough cleaning in internal systems. The official limits are always complied with and we strive to continuously reduce our emissions values.

For Schill+Seilacher GmbH waste prevention always comes before waste recycling. The amount of waste to be disposed of is minimal and is continuously monitored.

4. Management systems

Schill+Seilacher GmbH guarantees its customers safe and reliable processes within the framework of its integrated management system certified according to DIN EN ISO 9001, DIN EN ISO 14001 and DIN EN ISO 50001. The system supports us in complying with applicable laws and other regulations, meeting customer demands and identifying potential risks during implementation. Our management system also promotes the process of continuous improvement. Every year we set ourselves goals in the areas of quality, environment, sustainability, occupational safety and energy. All employees are informed of these goals so that we can work together to achieve them.

4.1 Management responsibility

In their daily activities, our managers and executives bear full responsibility for implementing and maintaining our corporate mission statement, code of conduct and integrated management system.

Management reviews, which are prepared every six months by our management representatives, are examined in detail by the management and taken into account in strategic planning.

4.2 Statutory requirements

We comply with all national and international laws, rules and regulations. Every employee must observe the relevant statutory regulations of the respective legal system in force.

Monitoring of statutory amendments and requirements is carried out by a statutory register.

Schill+Seilacher GmbH strives to maintain a cooperative and open relationship with the authorities.

4.3 Customer demands

Satisfaction of our customers is our top priority. Therefore we are in constant contact with our customers, to identify, check and monitor their requirements and take all necessary measures to meet them as effectively as possible.

4.4 Risk management

Health and safety of our employees and customers is our greatest concern. With this in mind, we have developed mechanisms to identify risks in all areas of the company and with regard to the application of our products at an early stage trying to minimise such risks to the extent possible.

We take every actual or potential risk associated with our products seriously, even if it only occurs after our product has been used by our customers. Our employees are responsible and shall identify, reduce and report any risks associated with our products and their use.

4.5 Employee qualification

Schill+Seilacher GmbH selects, employs and promotes its employees on the basis of their qualifications and skills specific to their role.

We support the target-oriented continuous qualification of employees in order to guarantee a high performance level and high-quality work.

4.6 Continuous improvement

We want to go the extra mile and strive to continuously improve our processes and products. We develop improvement plans based on the results of site inspections, internal and external audits, other reviews and management reviews. Immediate measures resulting therefrom are implemented, corrective and preventive measures are planned, carried out and constantly monitored for effectiveness.

5. Ethical business practices

We want to behave in an ethically correct manner and with integrity in all our entrepreneurial activities. We expect all of our employees, managers and business partners to do the same.

5.1 Business integrity

Maintaining a high level of integrity is a core element of our corporate philosophy. Therefore, Schill+Seilacher GmbH undertakes to ensure that all business activities are based on legally compliant, ethical and fair principles. Bribery, corruption, extortion or even illegal transactions (such as insider trading, money laundering etc.) will not be tolerated. We only maintain relationships with business partners who conduct legally compliant business with funds from legally compliant sources and support all necessary measures proactively to prevent illegal business practices.

5.2 Gifts, gratuities and hospitality

In accordance with generally accepted ethical business practices, gifts should only be of socially adequate, symbolic value, so that their acceptance does not put the recipient in any position of obligatory dependence. This applies to gifts on our part to individuals or companies as well as to gifts that are offered to our employees. Only presents bearing our name or trademark, slogan or logo may be given to guests as presents, which are thus clearly identified as advertising media. In case of doubt, it is advisable to consult the supervisor. Schill+Seilacher GmbH donates to charity as part of our social corporate responsibility. These donations are never related to specific customer purchases or purchase commitments. The German criminal law provisions on bribery and granting advantages, which also apply to activities abroad (Sec. 299 StGB [German Criminal Code]), are complied with.

5.3 Conflict of interest

Business decisions must be made in the best interest of Schill+Seilacher GmbH. Relationships of an employee or his/her family members with possible or existing suppliers, customers, competitors or other persons, with whom Schill+Seilacher GmbH does business, should not affect the independent and reliable judgement of the corresponding employee. Employees should neither directly nor indirectly pursue interests outside the company, which actually or apparently in conflict with the interests of Schill+Seilacher GmbH. In case of doubt, employees are urged to contact their supervisor, the works council and/or the management directly. Every employee can contact a member of the site management or the Chief Executive Officer at any time. In addition, an independent compliance hotline was set up, which can be contacted by the employees at any time.

5.4 Fair competition

It is only possible to establish a stable business cooperation that benefits all, if there is fair competition and strict compliance with the legal system. Every employee of Schill+Seilacher GmbH is obliged to respect and adhere to the national and international rules of fair competition and not to take any actions which violate cartel law.

In particular, employees should not discuss trade secrets with competitors. The allocation of customers, territories production programmes is also inadmissible, as is the submission of sham offers in tender procedures or the collusion with competitors on prices or a waiver of competition.

5.5 Accurate business documents

Our effective controlling system enables our management to make informed decisions for our company and to ensure the integrity of information provided to authorities and the public.

Our controlling essentially consists of the following three components:

- Proper classification of business transactions and strict compliance with the generally accepted accounting principles (GAAP);
- Strict internal procedures to ensure that assets are protected and information is recorded accurately and consistently; and
- Proper and timely reporting of all transactions and financial data.

5.6 Data protection

A fundamental aspect of a trusting and effective cooperation is responsible handling of personal data. We are aware of the importance of information security for the company, for the individual employee and for our business partners and guarantee effective protection of information and data. Every employee should carefully protect confidential information from unauthorised and unlawful collection, use and disclosure. Confidential data include not only proprietary information (such as recipes and manufacturing processes), but also information from our business partners and their employees. In case of particularly intensive cooperation (e.g. custom-specific production), additional non-disclosure agreements are concluded.

5.7 Industrial and intellectual property rights

Our intellectual property is one of our most valuable assets. All employees are required to protect this property from illegal access. Trade secrets, such as information about certain manufacturing processes or the recipes of our products should not be disclosed to third parties.

In general, confidential information is only passed on to those employees who absolutely need it to perform their work. We respect property rights of third parties in the same way. All new products are immediately checked for possible infringement of applicable intellectual property rights of third parties.

5.8 Compliance with global trade requirements

Schill+Seilacher GmbH is obliged to adopt usual business customs and market practices on the global market. Employees in our international branches must comply with the laws, cultural customs and practices of the countries in which they work.

We ensure that our business activities do not infringe on any international embargo or export control regulations.

5.9 Conflict minerals

Schill+Seilacher GmbH is aware of its responsibility with regard to the procurement of raw materials and the importance of transparent raw materials trading. For this reason, we always check the origin of our raw material – along a global supply chain.

Procurement of minerals from conflict regions such as the Democratic Republic of Congo, one of the neighbouring countries or highly endangered areas is not an option for us. No product of Schill+Seilacher GmbH contains conflict minerals such as coltan, cassiterite, wolframite, tantalum, tungsten, gold or their derivatives.

In some products, we use tin compounds as catalysts. Our suppliers have informed us regarding the origin of tin and thus assured us that it does not come from a conflict region.

6. Raising concerns

We expect our managers, employees and business partners to behave in a legally and ethically correct manner in their daily work and to adhere to the principles set out in this code of conduct. Decisions should always be made based on this code. You should give notice of detections:

- In case of any concerns with regard to (legal) risks for the Schill+Seilacher group, i.e. concerning compliance, export regulations, business ethics and fraud as well as of the Schill+Seilacher group;
- Serious faults of employees and/or management regarding application of the values of the Schill+Seilacher group, business conduct and behaviour, even with regard to inadequate treatment of employees by supervisors or line organisation;
- Theft and fraudulent conversions of assets and funds of the Schill+Seilacher group as well as financial fraud, supplier fraud, acceptance of bribe money, accounting manipulation, violation against internal report monitoring and accounting control;
- If members of Schill+Seilacher group or third parties acting in the name of Schill+Seilacher group offer donations, presents or entertainment, which are unethical for the business partner or public officers, as well as misconduct, corruption and in connection with corruption or bribe money; Violation against cartel and competition law, spying or sabotage and violation against information security.

If one is aware of an infringement against our code of conduct, he is requested to inform the Schill+Seilacher GmbH group management or human resources department.

For such cases we also established the following mail address: csr@schillseilacher.de

Employees as well as business partners who will contact us with their questions and concerns in good condition about our code of conduct don't have to fear neither retaliations nor disadvantages. Each hint will be handled absolutely confidential and will be taken seriously.

Besides Schill+Seilacher group also established an external compliance hotline for all employees, who prefer a personal contact. This should not only enable all employees but also all customers, suppliers, shareholder or other stakeholder to give their announcements as far as – for whatever reason – no direct contact to seniors or the human resources department is desired. The compliance hotline forwards the messages to the advisory board, who decides on further procedures. The identity of the corresponding person is – if desired – treated strictly confidential and will not be revealed to other employees without agreement.

Please find the contact data of the external compliance hotline as follows:

Telefonnummer: +49 (0)2359 2955914
E-Mail: compliance@gebauer-kaus.de
Postanschrift: Gebauer-Kaus, Rechtsanwälte-Fachanwälte
Partnerschaft mbB
Kölner Straße 159
DE-58566 Kierspe

Reports of probable misconduct will be investigated and measures will be taken.

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