



TIBCHEMICALS

Code of Conduct

TIB Chemicals Group

TIB Chemicals AG (hereinafter referred to as “TIB”) advocates social and environmental sustainability.

As an industrial enterprise as well as an employer, TIB is aware of its responsibility towards the production sites which it operates and their surroundings, the environment, whose resources TIB uses, its customers, its many partners and its employees.

For this reason, TIB has undertaken to organise its behaviour in all areas in a sustainable manner and to observe the highest possible ethical standards. In order to live up to this responsibility, TIB has defined a set of guiding principles on which to base its behaviour.

The following code of conduct constitutes a significant part of these guiding principles.

As a result, TIB advocates compliance with the ethical principles set out below among its own corporate management, its employees, its business partners and in particular its customers and suppliers.

A breach of these principles represents a serious disruption in a business relationship that TIB cannot accept.



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A. Society

I. Environmental Protection

TIB undertakes to conserve natural resources and to operate in a responsible and efficient manner with regard to environmental protection. In particular, TIB promotes measures aimed at reusing and recycling resources. At the same time, TIB undertakes to take decisions relating to resources in accordance with the principle of proportionality in order to minimise unavoidable consequences for the environment.

II. Waste, Emissions and Resources

TIB undertakes to reduce waste and emissions to a minimum. Natural resources must be used sparingly.

The recycling and reuse of products should have priority over disposal. TIB undertakes to operate a suitable system to ensure that waste, air emissions and effluents are handled, transported, stored, recycled, reused and managed safely.

III. Principles of Social Responsibility

Social responsibility is an indispensable component of TIB's company policy.

TIB respects and supports the internationally acknowledged human rights according to the core principles of the International Bill of Human rights of United Nations General Assembly. The principles set out therein include in particular the right to respect for human dignity (Article 1) and privacy (Article 3), the right to assembly and association (Article 20), the right to fair remuneration (Article 23), the prohibition of discrimination and harassment (Article 2) and the prohibition of slavery and servitude (Article 4) as well as the applicable safety regulations against child labour and forced labour.



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B. Business Partners and Dealings with Third Parties

I. Customers, Suppliers

TIB seeks long-term partnership with its customers and suppliers and makes every effort to provide tailor-made products and services including necessary information and support and to maintain an impeccable, fair and dependable business relationship.

Suppliers should, at the request of TIB, draw up appropriate documentation with which they can prove that they have adopted the principles contained in this code of conduct in their company-internal organisation and ideally are enforcing them vis-à-vis their own suppliers.

Conflict Minerals Sourcing Policy

TIB Chemicals does not use any minerals or products sourced from minerals, originating from conflict-affected or high-risk areas. Tin and tin-based materials are procured only from suppliers, which in turn permit appropriate control of the supply chain.

II. Competition Law

TIB is unreservedly committed to fair competition and abides by legislation relating to restrictions on competition in all countries where the company conducts its business. Agreements, arrangements or understandings which distort, restrain or prevent fair competition or which have an effect on fair competition are prohibited.

III. Avoidance of Conflicts of Interest

TIB attaches great importance to its employees' avoiding any conflicts of interest or loyalty when performing their duties. A conflict of interest occurs when an employee's private interests are at variance with the company's interests or when the semblance of this arises. This is the case, for example, when an employee takes measures or pursues interests that prevent him/her from performing his/her duties properly and efficiently.



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Granting and accepting benefits to or from third parties may only occur within the context of a customer business relationship provided that such benefits accord with common business

practice, no inappropriate exercise of influence can be identified, the company's image will not be damaged thereby and there is no departure from company-internal regulations. All employees must refrain from actions that infringe domestic or foreign provisions relating to money laundering. TIB aspires to the highest level of transparency in this area.

The requirement of transparency can only be enforced with the support of employees. The company management must be consulted in good time should any concerns arise about the legitimacy of transactions involving the transfer of cash or about the legitimacy of granted or accepted benefits – including those of a minor type.

C. Data Protection

The company management of TIB is aware that the unmistakable advantages of electronic communications are associated with considerable risks regarding personal privacy and data security. Effective precautions against these risks are an important element of IT management within the group, of the executive function and also of the conduct of each individual employee.

Personal data may only be recorded, processed or used where this is required for specific, distinct and legitimate purposes.

High standards and the strictest confidentiality must be ensured with regard to data integrity and technical safeguards against unauthorised access.

D. Employees

I. Safety at Work and Health Protection



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A sense of responsibility towards employees and colleagues is the best possible precaution against the risk of accidents. This applies to the technical planning of workplaces, facilities and processes as well as to safety management and personal conduct in day-to-day work.

TIB has established its own rules and regulations that go beyond statutory obligations and are intended to ensure the best possible protection for all persons employed on the business premises. For example, any form of intoxicant including alcohol is strictly prohibited.

TIB constantly strives to ensure that the working environment corresponds to the most stringent demands of a health-oriented organisation and always seeks to take measures that promote the health of its employees. In particular, employees must be protected from any sources of chemical, geological or other danger and must not be exposed to any excessive physical strain.

TIB campaigns particularly for fair pay of its employees according to local market conditions, reasonable working hours and paid leave in accordance with the relevant legal regulations.

II. Social Responsibility

TIB respects the right of all employees to join legally recognized workers' organizations and undertakes to comply with all legislation in contact with employee representatives.

TIB considers it to be its entrepreneurial duty to engage itself actively on behalf of the community. For TIB, entrepreneurial success and responsibility for the social environment are two sides of the same coin.

Social commitment is not restricted in this case to the welfare of its own employees but also calls for the commitment of its employees themselves. Guided by the realisation that people who show voluntary commitment tend to take on significant responsibility and are especially committed in their work, TIB promotes the social commitment of its employees in the community.

III. Training and Education



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TIB also takes care to ensure that the content of the code of conduct is observed with regard to training and education.

TIB sees a particular responsibility towards young people in the field of vocational training. Vocational training is carried out in accordance with the relevant occupational training regulations and must always conform to the currently applicable version.

In providing advanced training for its employees, TIB systematically pursues the objective of enabling them to meet the changing demands of their workplace in the best possible manner.

TIB undertakes to comply with legal and regulatory further education provisions and requires its employees to meet this undertaking.

TIB promotes advanced training for employees that goes beyond legal requirements. This applies to a wide range of fields and subjects that appear to make sense in individual cases. An additional budget is made available for advanced training that falls outside what is legally stipulated.

The necessary measures are determined at least once each year.

IV. Respectful Collaboration among Employees

All employees are entitled to fair, polite and respectful treatment by their managers, staff and colleagues.

Nobody may be subjected to harassment or discrimination on the grounds of race, colour, nationality, origin, gender, belief, ideology, political opinions, age, physical constitution, appearance or sexual orientation or suffer any disadvantage without an objective reason.

Every employee is obliged to respect the personal sphere of other employees and to refrain from discriminatory behaviour. Sexual harassment and acts of violence in any form whatsoever are forbidden.



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TIB will observe these principles vis-à-vis customers, suppliers and business partners and likewise expects these to observe and comply with these principles.



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V. Reporting Concerns

Employees are urged to report any unlawful behaviour that takes place within the company to the company's management. The same applies when employees suspect that such behaviour might occur within the company.

TIB guarantees that employees will be treated within the company in an ethical and proper manner.

TIB expects its employees to observe and comply with this code of conduct.

Managing Board

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