

## **Code of Conduct of Oxxynova GmbH**

### **Introduction**

Oxxynova is a medium-sized company in the basic chemicals industry. Our core product is dimethyl terephthalate (DMT), an important raw material for the European technical plastics industry. As Europe's market leader in the production and sale of DMT, we feel we have a special responsibility to provide a continuous, reliable supply of DMT to our customers and to contribute to their success by providing top-quality products and services.

In addition, in recent years Oxxynova has established itself as a distiller of chemical side-streams as part of its commitment to a circular economy. With a special focus on the distillative recycling of methanols, tetrahydrofuran and glycols, the company processes more than 80,000 tonnes of raw material every year which, once cleaned, can be returned to the producer or reused in further production processes.

We want to be a reliable, conscientious and dynamically innovative partner not just to our customers, but also to our service providers, suppliers and employees, and to work to ensure the success and satisfaction of our various stakeholders.

This code of conduct sets out the values, principles and behaviour that define Oxxynova GmbH's actions as a company, and is binding for all employees and members of the executive board. The aim of the company management is to comply with ethical standards and create a working environment that promotes integrity, respect and fairness. A strict business policy that follows the law and our guiding principles serves our long-term corporate interests.

### **1. Compliance with laws and other provisions in Germany and abroad**

In all its commercial decisions and actions, Oxxynova GmbH strives to recognise and respect the applicable laws and the different cultures, business practices and customs at home and abroad. Integrity and sincerity encourage fair competition, including when it comes to our customers and suppliers. The business processes and practices that our market involves must comply with international laws, regulations, requirements, standards and official directives.

### **2. Duties of the company management**

Oxxynova GmbH believes it has a duty to act with an awareness of economic, social and environmental issues. It therefore strives to operate its business competently and ethically, and to protect the principles of fair competition in all the markets in which it is active by complying with the applicable laws on cartel prohibition, competition, and restriction of competition. Unfair advantages over customers, suppliers or competitors must be avoided.

The company management is responsible for developing the business in an economical and sustainable fashion. This is done on the basis of medium-term and long-term goals and corporate principles that aim to secure the survival and success of the company in the future.

### **3. Conflicts of interest**

Oxxynova GmbH expects its employees to be loyal to the company.

All employees must avoid situations in which their personal or financial interests come into conflict with those of Oxxynova GmbH. Therefore, in particular, acquiring a participating interest in competitors, suppliers or customers, or entering into business relationships with them in a private capacity are forbidden if this could lead to a conflict of interest. The interests of Oxxynova GmbH must not be impaired by conflict situations.

Such conflicts of interest could arise in a variety of situations. Therefore, employees may not accept benefits – in any form whatsoever – if it can be reasonably expected that they could influence business decisions or transactions of Oxxynova GmbH. Invitations must be within the bounds of normal business hospitality. Employees must not directly and/or indirectly use the confidential information to which they have access in connection with their position at Oxxynova GmbH to their personal advantage. All employees have a duty to promote the legitimate interests of Oxxynova GmbH as far as possible. Any situation involving competition with the company should be avoided.

Every actual or potential conflict of interest must be reported and discussed with the relevant supervisors.

#### **4. Quality, safety, health and the environment**

##### **Quality of our products and services**

Our clear focus on quality and customer benefits is an essential precondition for our success. We use our integrated management system for quality, safety, health and the environment as a tool for continuously improving all our services and activities. This system is based on globally applicable standards and takes the requirements of our customers into consideration.

#### **5. Health, safety and environmental protection**

Oxxynova GmbH is fully committed to the principle of sustainable development and taking responsibility for the future. This plays a key role in the way we think and act. We give equal consideration to economic, environmental and social issues. Through our involvement in the global Responsible Care initiative, we commit to actively and continuously improving our services relating to health, safety and environmental protection. Oxxynova GmbH complies with legal requirements, and its own more stringent guidelines, as a matter of course.

The health and safety of our employees is just as important a corporate objective as the quality of our products and our commercial success.

Occupational safety and health protection are integral to all our business operations and are incorporated into our technical, economic and social considerations right from the very start, beginning in the planning phase.

Each of our employees promotes safety and health protection in their own working environment and complies with the occupational health and safety regulations. All our managers have a duty to train and support their employees to allow them to take on this responsibility.

Protecting and promoting the health of our employees is a top priority for us. Our health management strategy includes offering regular medical care through our company health service, designing our workplaces with health matters in mind, and promoting targeted healthcare measures in partnership with health insurance providers.

#### **6. Safe and efficient production processes**

In our manufacturing processes we guarantee the safe handling of products and residual materials. We minimise our use of materials and energy, as well as our production of emissions and waste.

## **7. Constant improvements to safety**

Continually improving safety and health protection at the Oxxynova GmbH site is especially important to us.

Employees of subcontractors working for Oxxynova are subject to the same safety standards as our own employees. We take this into consideration when selecting and working with subcontractors.

## **8. Responsibility of employees**

Every single employee in our company is responsible for quality, safety, health and environmental protection, as well as for promoting constant improvement in these areas. Requirements and regulations are described in the integrated management system for quality, safety, health and the environment, as well as in guidelines and instructions. However, the company understands that each individual can make a contribution to the sustainable development of the company. For this reason, we encourage our employees to integrate and implement the principle of sustainability in their daily thoughts and actions.

## **9. Prohibition of corruption**

Oxxynova GmbH condemns corruption and bribery. We will not tolerate any actions that involve doing business by improper means. Employees of Oxxynova GmbH may not offer business partners any benefits or receive or accept benefits from them if this could impede objective and fair business decision-making or even simply create the appearance that this is the case.

## **10. Insider trading regulations**

All employees of Oxxynova GmbH are required to comply with the rules on insider trading set out in the German Securities Trading Act (*Wertpapierhandelsgesetz, WpHG*), in particular the ban on insider trading. This applies in particular to employees who have access to non-public information on Oxxynova GmbH or a company with which Oxxynova GmbH does business.

Insider information includes, for example, executive management plans, the introduction of new products or manufacturing processes, corporate transactions, unpublished financial figures of Oxxynova GmbH, significant contracts or business connections, financial information or significant legal disputes, among other things.

The use of significant, non-public information may constitute a violation of law.

## **11. Fair working conditions**

All employees of Oxxynova GmbH have an obligation to ensure a safe and healthy working environment. For this reason, safety regulations and practices must be complied with at all times.

As a socially responsible employer, Oxxynova GmbH places great value on its employees, as the success of the company depends on each and every individual. The personnel policy of Oxxynova GmbH helps to ensure that all employees are offered opportunities for personal and professional development. This personnel policy is built on a foundation of mutual respect, open exchange of views, encouragement of critique and ideas, and equal opportunities across all sexes, ages and cultures.

Oxxynova GmbH condemns illegal discrimination and harassment in all its forms. A culture of equal opportunity and mutual trust and respect is something about which we care deeply.

We promote equal opportunities and prohibit discrimination when recruiting employees or when granting promotions or opportunities for development and further training.

Oxxynova treats all its employees equally, regardless of sex, age, skin colour, culture, ethnic origin, sexual identity, disability, religion or belief.

We respect the internationally recognised human rights and ensure that they are complied with. Oxxynova strictly rejects all forms of forced or child labour.

We recognise the right of all employees to form unions and employee organisations on a democratic basis within the framework of national law.

The right to appropriate remuneration is recognised for all employees. As a minimum, pay and other benefits comply with the applicable national and local laws, and with the level set by the national industry sectors and regions.

#### **12. Cooperation with employee representatives**

Trusting and close cooperation with employee representatives is a key part and proven cornerstone of the corporate policy at Oxxynova GmbH. Open and constructive dialogue underpinned by mutual respect forms the basis for mutual trust and a cooperative environment.

#### **13. Handling internal knowledge**

Employees of Oxxynova GmbH have a duty to ensure a rapid and seamless exchange of information within the company. Information must be passed on to the relevant departments accurately and completely, except in rare cases where overriding interests prevail, in particular in connection with the duty of confidentiality. Relevant knowledge must not be unduly withheld, falsified, or disclosed selectively.

Dishonest reporting within the company or to third-party organisations or persons is strictly forbidden. All financial statements and annual reports, business papers and other commercial documents of Oxxynova GmbH must accurately represent business operations and transactions, and must comply with the legal requirements and the accounting policies and internal accounting procedures of Oxxynova GmbH.

#### **14. Handling assets**

All employees of Oxxynova GmbH are responsible for the correct and careful use of the company's property. All employees have a duty to protect the property of Oxxynova GmbH against loss, damage, misuse, theft, misappropriation or destruction. All employees must immediately inform their supervisors of any use of company assets that does not comply with the above.

#### **15. Confidentiality and data protection**

A large proportion of the business information of Oxxynova GmbH is confidential or legally protected, meaning that a duty of confidentiality exists. This does not apply in cases where Oxxynova GmbH has approved the publication of information or where disclosure is necessary in order to comply with laws or regulations.

The duty of confidentiality applies in particular to intellectual property. This includes business secrets, patents, trademarks and copyrights, as well as business and marketing plans, drafts, business papers, salary data and any other financial data and reports that have not been published.

All personal information on employees, customers, business partners and suppliers, as well as other third parties, is used with care within Oxxynova GmbH and is kept confidential in full compliance with data protection legislation. The protection of this information must be ensured with the utmost care.

#### **16. Implementation and monitoring**

The rules contained in this Code of Conduct form a core element of the corporate culture at Oxxynova GmbH. These principles must be observed uniformly at all times. Every single employee is responsible for making sure this is the case.

Should an employee have concerns or complaints about any of the points listed in this Code of Conduct, or knowledge of a potential violation of the conduct guidelines set out here, they should present these to their supervisor immediately for clarification. This can also be done anonymously or in confidence. If the employee is not satisfied with the explanation, they may take their concern or complaint not just to their supervisor but also to the HR department or the works council. Oxxynova GmbH shall not permit any retaliation in response to complaints that are reported in good faith within the context of this Code of Conduct.

### **17. Responsibility**

All employees, as well as the members of the executive board of Oxxynova GmbH, are bound by the rules of this Code of Conduct. Violations of this Code of Conduct will have consequences. In serious cases, this may lead to termination of employment.