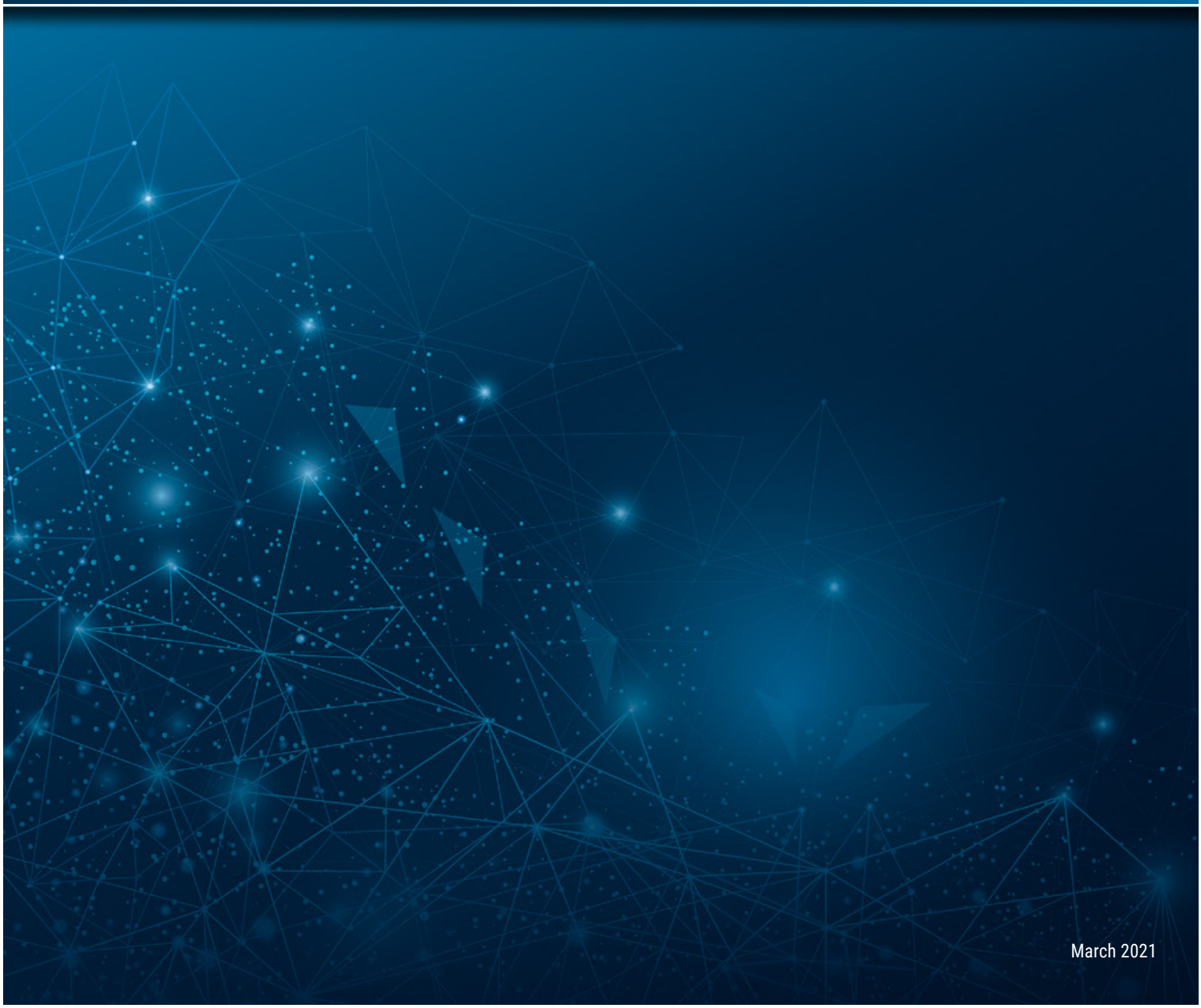
WeylChem
Group of Companies

Code of Conduct

Day-to-day workplace ethics at the WeylChem Group of Companies



March 2021

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In a word

Dear Colleague,

The WeylChem Group of Companies brings together companies from many different backgrounds with a wide range of specific expertise and technologies in a common organization. This model means we can offer high quality products and solutions to customers in many different sectors.

This approach is most fruitful when we combine the individual companies' technical expertise with a common understanding of fundamental behaviors.

This firstly relates to our external contacts: customers, suppliers, authorities, neighbors and other stakeholders must be certain that we will always fulfill our business responsibilities, irrespective of the particular division they are currently in contact with.

But internally too, accepted rules of behavior make us still stronger as a team. This applies both to the supervision of projects spanning a number of divisions and to the managerial approach taken by line managers or the development of an international career within the group.

This code of conduct outlines the fundamentals essential for achieving this result.

Please read the document carefully and let these rules be the principles guiding your daily work routine. You'll be helping to ensure that the members of the WeylChem Group of Companies and their personnel are regarded as trustworthy partners around the world.

Yours sincerely,

Dr. Uwe Brunk
President, WeylChem Group of Companies

Introduction

This Code of Conduct is intended to support you as a member of staff within the WeylChem Group of Companies to behave in a legally and ethically irreproachable manner in your daily work routine. It is part of our comprehensive Compliance Management System (CMS).

We fundamentally trust the overall professionalism and integrity of our personnel. This document should therefore not be viewed as a detailed set of instructions covering every eventuality, but instead as a framework to guide reasonable behavior.

If, on a case-by-case basis, laws, internal corporate regulations or labor law agreements define requirements which go beyond the rules of this Code of Conduct, these latter requirements are to be viewed as binding. If, on the other hand, the Code of Conduct or other internal requirements of the WeylChem Group of Companies set requirements which are more stringent than those defined by law, the internal guidelines will take precedence.

A Chief Compliance Officer at the WeylChem Group of Companies level coordinates any activities associated with this Code of Conduct and is available at any time to offer expertise and support.

The Code of Conduct applies worldwide to all personnel within the WeylChem Group of Companies, irrespective of organizational unit, hierarchical level or geography

Line Managers' Responsibilities

Personnel with management responsibilities must ensure that the staff reporting to them are familiar with the content of this document and, if need be, must offer appropriate training. Acting as role model, you must yourself at all times act in accordance with the rules set out here both in your internal relations and your external business dealings.

Staff Responsibilities

All members of staff have a duty to familiarize themselves with the Code of Conduct, put its requirements into practice in their daily work routine and, if need be, attend appropriate training. If you are uncertain what behavior is reasonable in a particular circumstance, you must consult your line manager or the Chief Compliance Officer.

Violations of the Code of Conduct

Line managers are responsible for compliance with the Code of Conduct in their area of responsibility and must follow up any indications of possible violations. If proven, violations are punishable and may lead to disciplinary measures up to and including dismissal in the context of applicable labor laws.

Notes

The rules described here are for protecting our reputation. Anyone failing to follow them does harm to all their colleagues. Personnel who see or suspect any infringement of the rules are therefore encouraged to contact their line manager or the Chief Compliance Officer. Complete anonymity is guaranteed.

Contact email for Chief Compliance Officer Eduard Koster:
eduard.koster@ic-investors.com

Success is a Joint Affair

The WeylChem Group of Companies brings together some highly specialized multinational companies. This structure creates major opportunities for us. Internally, it offers all the individual companies access to numerous skills, technologies, processes and plants which may complement their own capabilities. At the same time, opportunities also arise for instance in the joint purchasing of raw materials.

Externally, this structure enables us to offer customers from the most varied target segments a wide range of relevant products and solutions. Working in partnership within our corporate family means we can draw optimum benefit from this unique combination.

External

For our customers, partnership means that we actively cooperate to develop the best solution to each problem. We achieve this by actively involving our experts and organizations within the group where this may add customer value. We make use of the diversity of available knowledge to increase customer satisfaction, offer customers additional options and so boost our business as a whole.

We cultivate a cooperative relationship with stakeholders by providing truthful information, treating contacts as equals and handling criticism constructively. Our goal is always to develop long-term relationships on a partnership basis.

Internal

Within the WeylChem Group of Companies, we support one another at all levels. This applies not only in our own workplace but also across other divisions, business units and geographic frontiers. We cultivate contacts and exchange information where this is in our common interest. We are open to new ideas and opportunities, irrespective of their origin within the group.

We have a holistic outlook on markets and customers with the aim of creating the solution which adds the greatest value. We achieve this by making use of the resources available within the group and ensuring that it is the best positioned corporate unit which responds to a specific customer inquiry.

In cases of doubt, this decision is taken by the appropriate committee within the framework of our strategic portfolio management.

Fairness and Integrity are Key

The members of the WeylChem Group of Companies consider themselves reliable, trustworthy employers and business and contractual partners. We create the necessary structural conditions to ensure that we always live up to this standard in our internal dealings with one another and with our external contacts. This includes our members of staff fundamentally abiding by the law and behaving in an ethically irreproachable manner.

Internal

1. Managerial Approach

Managers treat colleagues and staff with respect. Supporting and developing personnel is just as important to them as the strategic and operational management of business matters. Our managers act as role models in implementing this Code of Conduct.

2. Staff Rights

We consider ourselves bound by the Universal Declaration of Human Rights and the principles of the International Labour Organization (ILO) and are categorically opposed to child and forced labor. All members of staff are entitled to fair, unprejudiced and respectful treatment.

We respect the right of our personnel to join unions and/or other employee organizations and to bargain collectively. Members of staff are protected from discrimination and receive the support they require to perform their function.

3. Harassment and Discrimination

We provide a working environment which is free of discrimination, bullying and harassment. We do not tolerate staff or colleagues being disparaged on the basis of their race, skin color, language, gender, religion, political or other outlooks, age, sexual orientation or other personal features. The same applies to harassment, in particular of a sexual nature. Our managers have a duty to put a stop to and punish such actions.

We decide to employ applicants and promote members of staff exclusively on the basis of their performance, abilities and potential with regard to the task in hand. This principle of equality also applies to initial and in-service training, remuneration and the assignment of duties.

What is Discrimination?

Direct discrimination occurs when an employer treats an applicant or member of staff less favorably than another in a comparable situation or unjustifiably provides a specific group of people with advantages from which others are excluded. Indirect discrimination takes place if a company issues regulations or measures which are only apparently neutral but actually have a discriminatory effect on individuals or groups of people.

What is Bullying?

Bullying in the workplace is when a member of staff is psychologically or physically persecuted, harassed or excluded for an extended period of time by a line manager, colleague or subordinate. In addition to active attacks, bullying may also take the form of systematically passively excluding and ignoring a person.

What is Sexual Harassment?

Sexual harassment in the workplace is deliberate, sexually motivated behavior which the affected person clearly rejects and which violates their personal dignity. In addition to explicit sexual acts, which are a criminal offense, sexual harassment also includes for example unwanted, sexually motivated physical contact, comments of a sexual nature, the display of pornographic material in working spaces, invitations to perform sexual acts or also insistent invitations, for example to dinner, in which the person concerned is clearly not interested.

4. Invitations and Gifts

Gifts are a normal expression of personal or professional ties in day-to-day business. They can, however, be misunderstood or interpreted as an attempt to exert undue influence. Consequently, no gifts, offers of entertainment or other benefits may be accepted which might cast doubt on an individual's personal integrity or the integrity and independence of the WeylChem Group of Companies.

Business decisions must in principle be made in the best interests of the company which the member of staff is representing. Personal relationships or benefits from business associates must play no part.

Gifts, invitations or services may be accepted providing they are in line with conventional and legal business practice, are ethically unassailable and are made completely transparent. Such benefits must in no way influence the decision-making or behavior of the member of staff concerned. You must obtain your line manager's consent in the case of high value gifts.

Hospitality

Hospitality at business functions may be accepted providing that it is of a conventional nature and serves the business interests of the members of the WeylChem Group of Companies. Your line manager must be informed of such invitations in advance.

A judgment may have to be made as to the extent to which the invitation can be considered "conventional", for instance if the host is paying further costs such as travel or hotel accommodation or makes additional offers such as additional hotel services or visits.

Such offers to people without a direct connection to the WeylChem Group of Companies such as spouses, partners or children should generally be declined.

If in doubt, please consult your line manager or the Chief Compliance Officer in advance.

5. Conflicts of Interest

A conflict of interest arises when a member of staff's personal interests might be inconsistent with those of the employer.We therefore expect our staff to maintain a strict separation between their business and private interests and not to allow any conflicts of loyalty to arise. Private interests must never influence business decisions and even giving any impression of such influence should be avoided.

Existing or foreseeable conflicts of interest must be disclosed to your line manager so that the subsequent course of action can be jointly discussed.

Examples of Staff Conflicts of Interest

- *Holding an interest in a company which has a business relationship or is in economic competition with the employer.*
- *Having a managerial or advisory function in a company which has a business relationship or is in economic competition with the employer.*
- *Holding an office in or being a member of a public institution which has directive or supervisory authority over the employer.*
- *Acquiring a land holding or shares in a company in which the employer is also known or may be foreseen to have an interest.*
- *Employment of a family member in a company which has a business relationship or is in economic competition with the employer.*

6. Money Laundering and Funding of Terrorism

The WeylChem Group of Companies supports the battle against money laundering and the funding of terrorism. Our members of staff never carry out or tolerate actions in their working environment which violate national or international legislation or other rules for combating money laundering and the funding of terrorism. We comply with current regulations for recording financial transactions.

In order to generally minimize the risk of becoming involved in money laundering, the members of the WeylChem Group of Companies only enter into business relationships with trustworthy companies, organizations and individuals. If necessary, appropriate investigations must be carried out.

Movements of cash, in particular in relatively large amounts, are not usual in business dealings and must therefore in principle be scrutinized with a critical eye. Where appropriate, our members of staff must inform themselves about the applicable threshold values in countries in which the WeylChem Group of Companies does business.

7. Free competition

We are convinced that free and fair competition is the basis for prosperity and positive social development. Our members of staff accordingly strictly comply with competition legislation.

Arrangements or de facto collaboration with competitors which lead to a restriction of free competition are inadmissible. Contracts which might have an impact on competition must in general be discussed with the legal department and the Chief Compliance Officer. Detailed information can be found in the "Competition Framework".

8. Corruption

We are successful on the market in fair competition with other suppliers thanks to our abilities and products. Attempts to achieve competitive or other advantages by dishonestly influencing third parties are inadmissible.

Members of staff of the WeylChem Group of Companies must therefore never offer or promise material or other advantages to business associates, office holders or other third parties with the aim of influencing their decisions or behavior.

9. Foreign Trade and Trade Controls

As a corporate group with global activities, the WeylChem Group of Companies complies unreservedly with current trade control provisions. For products which are subject to special import or export restrictions, we ensure that all necessary registrations, licenses and authorizations are in place.

When purchasing, manufacturing or circulating goods or purchasing or transferring technology, we comply with trade control requirements. This applies in particular to the provisions on handling dual-use products, combating terrorism and chemical weapons.

We strictly comply with existing embargoes and sanctions. We do not do business, whether directly or indirectly, in countries, with companies or with individuals on whom a legally binding embargo has been imposed. This also applies to countries, companies and individuals who might act as intermediaries in this respect.

If you are uncertain about the current legal situation or such links of potential business associates or suspect that the above obligations are being violated, please consult your line manager or the Chief Compliance Officer.

10. Expectations of Business Associates

We expect our business associates, like us, to recognize and comply with the principles of the International Labour Organization (ILO) – the right to freedom of association and collective bargaining, the abolition of child and forced labor and the prohibition of discrimination in the workplace.

Transparency is Our Business

Current data and a willingness to enter into an open dialogue are indispensable for effective internal collaboration and dependable relationships with external partners. We therefore ensure that we document relevant information methodically, make it available to other legitimately interested parties and use it as the basis for shared learning processes.

1. Accounting, Documentation, Reporting

We fulfill all statutory and other duties relating to accounting and documenting business processes. This includes establishing effective processes and internal controls for financial reporting and for publishing information in line with disclosure requirements. Our reporting procedures completely, clearly and traceably record and accurately present relevant processes and facts. We provide our customers as contractually agreed with reliable and timely reports and analyses. In so doing, we address actual, potential or foreseeable deviations or risks at an early stage so that the most effective strategic solutions can be developed.

2. Positive Error Culture

We are proud of our performance and celebrate our successes. We view errors and failures as opportunities to improve. The consequences and results of our business activities are therefore neutrally and honestly evaluated, analyzed and presented, ideally with reference to target parameters (KPIs). When discussing negative developments, we focus on identifying sources of error and opportunities for future improvement.

3. Communication with Stakeholders

The members of the WeylChem Group of Companies maintain an open dialogue with relevant stakeholders such as the communities neighboring our production plants, media, supervisory authorities, policy makers or NGOs. This is because transparency is here too the basis for mutual trust. We accordingly always attempt to keep exchanges and debates objective, truthful and solution-focused.

4. Sales, Marketing and Advertising

We comply with statutory requirements and relevant codes of practice and voluntary undertakings in sales, marketing and advertising. We present our services and products truthfully and factually. The same applies to competitors' services and products where comparisons are legally admissible.

We Think Long-term

For the members of the WeylChem Group of Companies, behaving sustainably means creating the overall conditions for long-term business. Environmental protection and safety here go hand in hand with strategies for example for retaining and developing our staff. Acting sustainably in this way also ensures our economic success.

Plant and Occupational Safety

As a corporate group active in the chemicals sector, we uncompromisingly meet our particular responsibilities in terms of plant and occupational safety. Management provides suitable processes to ensure that buildings, plants and other facilities fulfill all relevant safety criteria. The same applies to our personnel's working environment and conditions. We always completely comply with all legislative and other requirements in this respect.

Within their personal working environment, each individual bears joint responsibility for protecting themselves, colleagues and the environment by behaving safely. Safety guidelines such as operating rules, handling instructions, dress codes or traffic regulations must be followed at all times. So that we can continuously raise safety levels, all members of staff are encouraged to report any safety shortcomings and proactively suggest improvements.

Product Quality and Safety

The members of the WeylChem Group of Companies pursue professional quality management with the claim that our products and solutions always fulfill or exceed our customers' expectations.

We provide suitable technical and logistical solutions and adequate information to everyone involved to ensure that our products are safe during production, handling, transport and use. Legislative and internal product quality and safety rules must be followed at all times.

Environmental Impact

We use natural resources as efficiently as possible in all operating procedures and minimize emissions and waste volumes. We achieve this by using technical solutions as well as smart processes and work procedures. Environmental legislation, regulations and work instructions are strictly followed. We furthermore encourage all members of staff to minimize the environmental impact of their personal behavior in their daily work routine.

Human Resource Development

The knowledge, abilities and motivation of our personnel are the foundation of our long-term business success. This is why we put structures and processes in place to enable members of staff in every division to develop both professionally and personally within the WeylChem Group of Companies. All line managers have a responsibility to support the members of their teams in achieving this.

We Protect What is Valuable

Careful handling of goods, valuables and information which belong or have been entrusted to us is a prerequisite for mutual trust. This applies equally within our own organization and in relation to external partners. This duty of care extends from everyday objects through intellectual property to documents and data. Our members of staff faithfully protect anything of material or conceptual value.

1. Protection of Company Property

We fundamentally treat company property with care, use it as intended and take reasonable steps to protect it from loss, theft, damage and access by third parties. Members of staff use company property exclusively for business purposes except where private use is explicitly permitted.

2. Data Protection

We treat data records transferred to or created by us with the greatest care to prevent unauthorized access, basing our procedures on the General Data Protection Regulation (GDPR) or comparable legal standards.

3. Protection of Intellectual Property

We ensure that our customers' and our own intellectual property does not pass into unauthorized hands or is not misused. Where possible, we obtain effective legal protection for our new developments and ideas by filing for patents, trademarks, brand names or other suitable forms of protection. We faithfully respect corresponding rights held by our customers.

In particular in the context of custom manufacturing projects, members of the WeylChem Group of Companies frequently obtain access to customers' patented technologies or other intellectual property. Using appropriate processes and technologies, we ensure that this information is not made accessible to third parties without our customers' explicit consent.

What is "Intellectual Property"?

"Intellectual property" is the name given to the property rights to creations of the human intellect such as inventions, know-how or software. These rights include not only process or plant descriptions or trade secrets but also graphical representations such as logos or strategic concepts. Intellectual property can be protected in various ways including industrial property rights (patents and utility models, trademarks, designs), by being classed as a trade secret or by copyright.

4. Protection of Confidential Information

All personnel are obliged to maintain secrecy regarding confidential information both during and after their employment within the WeylChem Group of Companies. Such information includes for example business strategy and development documents, balance sheet data, cost calculations, contracts of all kinds and information about customers, suppliers and other business associates. Confidential information is exclusively used for business purposes for the benefit of the members of the WeylChem Group of Companies and is not made accessible to any third parties. We ensure that such data is at all times securely protected from access by unauthorized colleagues or external third parties.

Measures for Protecting Confidential Information

- *When traveling, use a privacy screen for laptops, tablets and similar devices.*
- *In general, make sure you use secure passwords and change them regularly.*
- *Save virtual documents in password-protected folders.*
- *Ensure that you always send emails only to the desired addressees.*
- *If necessary, label emails as "confidential" or "personal".*
- *Keep physical files in lockable cabinets or in a safe.*
- *Ensure that confidential documents are not visible to visitors.*
- *Comply with our "clean desk policy" and clear your desk at the end of each working day.*

We Make Responsible Use of Modern Means of Communication

Modern business processes are unimaginable without electronic means of communication. Within the WeylChem Group of Companies, we make smart, responsible use of these means of communication, being aware of both the opportunities and the risks they involve.

Electronic Means of Communication

“Electronic means of communication” are taken to mean company-owned devices such as smartphones, laptops or tablets together with the IT infrastructure and specific applications for internal or external collaboration such as collaboration platforms, email, chats or social media. In principle, the only electronic means of communication we use for business purposes are those which meet the technical standards of the WeylChem Group of Companies. New technology services, systems and platforms as well as software and means of communication operated by third parties must be checked and approved by the appropriate in-house service before being used.

In general, reasonable personal use of electronic means of communication is admissible subject to applicable rules and instructions, providing no other restrictions apply. Electronic means of communication must be used with due care, in particular in order to prevent third party access to data. Notify your local IT function if a device is lost or stolen or if unauthorized data access is suspected.

Social Media

The creation and operation of external social media channels for members of the WeylChem Group of Companies is in principle the preserve of the relevant specialist department. Members of staff with social media responsibilities must be appropriately trained and their duties include continuously monitoring the channel in question.

Staff members’ private social media channels must not be displayed or approved. Please nevertheless be aware that the manner in which you present yourself may have an impact on the public perception of your employer and act accordingly. If in doubt, consult your company’s social media manager before publishing a post.Strict regulation and a requirement for a minimum level of information often apply to communications relating to our products. Private posts about our products are therefore in general not permitted.

For any questions regarding this Code of Conduct, please contact:

Eduard Koster

Managing Director
WeylChem Holding S.A.

Chief Compliance Officer

eduard.koster@ic-investors.com
+352 22 69 72

Concept and editing:
Gartner Communications | Neu-Isenburg
ulrich.gartner@gartnercommunications.com | www.gartnercommunications.com

Layout:
Troop Productions | Düsseldorf
lh@the-troop.de | www.the-troop.de

Weylchem Holding S.A.
2A, Rue des Capucins | L-1313 Luxembourg
www.weylchem.com