

ALTANA

Supplier Code of Conduct

Preamble

ALTANA is committed to long-term sustainable development and strives to be a sustainable and reliable partner in the value chain. We are committed to operating in accordance with strong ethical principles, as detailed in our ALTANA Code of Conduct.

As a member of the United Nations Global Compact, ALTANA is committed to its core values in respect of human rights, labor and environmental practices, both within its organization and through its business relationships. In particular, ALTANA has zero tolerance for all forms of corruption, modern slavery and child labor, whether public or private.

Suppliers must comply with all laws and regulations applicable to their business, including the local laws and regulations of all countries outside their home country in which operations are managed, or services are provided. This Supplier Code of Conduct shall ensure that our relationship with suppliers reflects and supports the same high ethical and sustainable standards. It also aims at defining a similar understanding of how to implement these principles of ALTANA in the supplier's day-to-day business. The principles mentioned in this Supplier Code of Conduct are an integral part of our supplier selection and evaluation process. We expect our suppliers to meet this standard in their own business operations and to adequately address this standard along their supply chain. We further expect our suppliers to engage in an ongoing dialogue to foster the fulfillment of these standards in the supplier's own business operations and along the supply chain.

This Supplier Code of Conduct, in addition to the Policy Statement on Respect for Human Rights, can be found at www.altana.com.

The principles set out in this Supplier Code of Conduct ("Code") apply to all ALTANA suppliers worldwide and are the minimum requirements.

1. HUMAN RIGHTS AND SOCIAL STANDARDS

We support and respect internationally recognized human rights as set out in the Universal Declaration of Human Rights and in a manner consistent with the United Nations (UN) Guiding Principles on Business and Human Rights. In order to assume social responsibility, suppliers must act ethically. This includes the following aspects:

1.1 HUMAN RIGHTS

Suppliers must treat their employees with dignity, fairness and respect and are committed to ensuring a safe work environment that is free from and provides protection against human trafficking and slavery or slavery-like practices, including forced or involuntary labor, debt bondage, extreme economic or sexual exploitation and humiliation. The supplier is committed to supporting the protection and preservation of fundamental human rights, as affirmed by the Universal Declaration of Human Rights. Suppliers shall act responsibly towards neighboring society, safeguard the rights of indigenous people and landowners, and treat all members of society fairly and with dignity and respect. Suppliers shall not tolerate nor profit from the commission of war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

1.2 MUTUAL RESPECT IN THE WORKPLACE

The equal treatment of all employees must be a fundamental principle of the supplier's corporate policy. No one shall be discriminated on grounds of race, color, national, ethnic or social origin, religion or belief, sex, age, physical disability, mental disability, medical condition, ancestry, alienage or citizenship status, marital status, political opinion, creed, genetic information, height or weight, sexual orientation, gender, gender identity, gender expression, transgender status or any other characteristic protected by law. Suppliers must secure that they do not tolerate any behaviors or actions that are violent, intimidating, hostile, degrading, humiliating or offensive and amount to discrimination, harassment or violence.

1.3 DISCRIMINATION

Suppliers shall not discriminate in their hiring and employment practices based on caste, national, social or ethnic origin, religion or belief, age, disability, health status, gender, skin color, marital status, sexual orientation or identity, or political opinion (including equal pay for work of equal value).

Suppliers shall treat all their employees, regardless of their form of employment, fairly, with dignity, and respect, in accordance with fundamental human rights.

1.4 FAIR LABOR CONDITIONS

Suppliers shall comply with applicable laws regarding minimum wages and collective bargaining agreements to cover the basic needs of the employee and provide some discretionary income as well as industry standards on working hours, leave, and public holidays. Suppliers shall not tolerate physical punishment, unlawful detention, or physical, sexual or verbal harassment or abuse.

1.5 CHILD LABOUR

Suppliers must ensure that child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed, in any event not younger than 15 years. All employees under the age of 18 must be protected from performing work that is likely to be hazardous or that may be harmful to their health, physical, mental, social, spiritual, or moral development (see also ILO Convention No 138 and No 182).

1.6 FREEDOM OF ASSOCIATION

Suppliers shall respect the right of workers to form and join, or not to join, a trade union of their choice (including the right to bargain collectively and the right to go on strike without fear of discrimination or reprisals) as requested by the ILO Declaration on Fundamental Principles and Rights at Work.

1.7 PROTECTION FROM USE OF VIOLENCE, TORTURE AND INFRINGEMENT OF THE FREEDOM OF ASSOCIATION

Suppliers are expected to ensure compliance with the prohibition of hiring or using private or public security guards for the protection of the suppliers' enterprise if, due to the suppliers' lack of instruction or control, the use of security guards (i) violates

the prohibition against torture and cruel, inhuman or degrading treatment, (ii) violates life or limb or (iii) impairs the freedom of association.

2. ENVIRONMENT, HEALTH AND SAFETY

Suppliers must take reasonable precautions for the health and safety of their employees, customers, visitors, contractors, and other people who may be affected by their activities. In addition, they should act in an ecologically responsible and resource-saving manner. This includes the following aspects:

2.1 ENVIRONMENTAL PROTECTION

ALTANA expects its suppliers to comply with existing legislation and regulations regarding the protection of the environment and to conduct business in a responsible way with as little impact on the environment as possible. This includes (i) having an environmental management system, or at a minimum, an environmental policy and a system including a risk assessment approach, to prevent, mitigate, and control environmental damage caused by their operations; (ii) promoting renewable energy sources; (iii) striving to reduce their energy and water consumption to minimize their operations' impact on the environment by setting, monitoring, and reviewing reduction targets; (iv) continuously strive to minimize greenhouse gas emissions; (v) protecting natural ecosystems and ensure that they do not cause any changes, deforestation or damage to natural forests and other ecosystems (biodiversity).; and (vi) minimizing the amount of waste they generate by re-using or recycling to minimize environmental impact. Suppliers should further wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices. Suppliers shall ensure that renewable, plant-based raw materials are sourced responsibly and do not lead to adverse social impacts, including risks to food security, land use conflicts, or the livelihoods of local communities. Suppliers are particularly expected to ensure compliance with: (i) The prohibition of the manufacturing of mercury-added products, use of mercury and mercury compounds in manufacturing processes, and illegal treatment of mercury waste according to the Minamata Convention. (ii) The prohibition of the production and use of chemicals ("persistent organic pollutants") according to the Stockholm Convention; (iii) The Prohibition of non-environmentally sound handling, collection, storage and disposal of waste according to the Stockholm Convention; (iv) the prohibition of exports of hazardous waste according to Basel Convention and the Regulation (EC) No 1013/2006 of the European Parliament and of the Council dated 14 June 2006 on shipments of waste, prohibition of export of hazardous waste from countries listed in Annex VII to the Basel Convention to countries not listed in Annex VII; prohibition of the import of hazardous wastes and other wastes from a non-Party to the Basel Convention. Suppliers are further expected to respect and protect the function of the environment as a natural basis for life and its fundamental importance as a supply base for workers in the respective regions. This includes avoiding harmful soil changes, water pollution, noise emission or excessive water consumption, which

impairs the possibility of cultivation or access to food, drinking water and sanitary facilities or damages the health of a person. This also includes unlawful eviction and the unlawful taking of land, forests and waters whose use provides a person 's livelihood.

Suppliers who process animal-based products shall implement standards and best practice methods for the welfare of the animals along the entire supply chain and shall reduce animal testing to the lowest possible level and, as far as possible, give preference to alternative methods that do not involve animal testing

2.2 HEALTH AND SAFETY AT WORK

Suppliers shall comply with all occupational health and safety obligations (including safety standards and maintenance of workplace and work equipment, personal protective equipment, measures to prevent excessive physical and mental fatigue, adequate training, and instruction of employees).

2.3 PRODUCT SAFETY

Suppliers are expected to communicate current information with ALTANA in regard to environmental, health and safety (EH&S) matters of their products to enable safe usage of the products throughout the entire life cycle. Suppliers are expected to cooperate with ALTANA to enable downstream requirements in relation to suppliers' products and/or services to be fulfilled. In addition, suppliers shall regularly monitor the legal developments regarding the use of chemicals and substances in order to ensure continuity of supply. Suppliers shall support efforts to eradicate the use of any conflict minerals, hazardous and chemical substances. In the event that the material 'chain of custody' supplied is "indeterminable" or otherwise unknown, the supplier is expected to either attain the appropriate certifications or phase out that source of mineral / substance. Suppliers shall not use counterfeit or copied products.

3. APPROPRIATE BUSINESS PRACTICES

Suppliers must act with integrity and behave fairly in competition. Suppliers shall comply with applicable laws through appropriate management and governance structures and promote continuous improvement of the expectations set out in this Supplier Code. This includes the following aspects:

3.1 BUSINESS INTEGRITY

We expect suppliers to conduct business in a transparent, honest, and ethical manner. We do not tolerate bribery or corrupt practices, including any soliciting, accepting, offering, providing, or authorizing of bribes of any sort either directly or

indirectly. We expect suppliers (i) to have in place, communicate and enforce on their employees and contractors' clear policies and procedures relating to bribery and corruption. This includes with respect giving and taking of gifts, entertainment, hospitality, or anything else of value to ALTANA or people representing ALTANA in any way. (ii) to implement policies to prevent, identify and report any dealings with illegal funds or other money laundering activities in any way. (iii) to follow fair competition practices to earn our business and not indulge in any anti-competitive or unfair trade practices, including collusion, price fixing or restriction of supply, in any form. Suppliers shall comply with applicable laws and regulations, including requirements relating to anti-corruption (no active or passive corruption).

Suppliers shall not tolerate or profit from criminal tax evasion, money laundering, anti-competitive practices, or terrorist financing and comply with applicable tax and duty regulations ("Tax Honesty").

3.2 CONFLICT OF INTEREST

Suppliers shall avoid any conflicts of interest with their obligations to ALTANA and take reasonable steps to declare and manage any conflicts, including in respect of those involving their employees.

3.3 PROTECTING SENSITIVE, CONFIDENTIAL AND PROPRIETARY INFORMATION

Suppliers shall protect the privacy of individuals and the security of confidential assets and information in a conscientious and appropriate manner. Suppliers shall respect the intellectual property rights of third parties.

3.4 TRADE COMPLIANCE

Suppliers must comply with national and international applicable export control regulations and sanctions and embargo laws. Suppliers must cooperate with ALTANA in determining applicable export control restrictions.

3.5 RESPONSIBLE SOURCING OF MINERALS AND MATERIALS

Tantalum, tin, tungsten, and gold are materials that are subject to many ESG relevant topics and for which there are various legal regulations (e.g. EU Conflict Minerals Regulation, Dodd Frank Act), so we expect our suppliers to comply with these laws. Specific expectations for our suppliers, beyond legal compliance, will be determined on a case-by-case basis.

In addition to conflict minerals there are raw materials and process materials with identified environmental and human rights risks during extraction and further processing:

Aluminum	Zinc	Nickel
Chromium	Lithium	Platinum group metals
Graphite	Manganese	Rare earths
Cobalt	Mica	Steel / iron
Copper	Natural rubber	

When supplying or processing these materials, suppliers must implement due diligence processes and activities to identify, prevent, minimize, and mitigate associated risks.

4. GOVERNANCE

4.1 RISK MANAGEMENT

Suppliers are expected to analyze and manage risks and actual adverse human rights, and environmental impacts related to their activities and through their business relationships. They should have appropriate risk management processes in place and take appropriate steps to avoid and reduce risks. Suppliers shall ensure that their operations do not cause or contribute to human rights abuses and environmental rights violations. In case of risks or violations of those rights, suppliers shall remedy any adverse impacts directly caused, or contributed to, by their activities or through business relationships.

4.2 MONITORING

Suppliers shall have an appropriate process in place to verify compliance with this Code.

Suppliers shall, upon request, participate in audits and provide ALTANA with information and data (including self-assessments) to verify compliance with the Code. ALTANA, and any third party appointed by ALTANA, shall have the right to access all the sites of its suppliers and sub-contractors to perform such audits. Any non-compliance of the Code must be reported to ALTANA. Reports can be made directly to the relevant contact person at ALTANA. Breaches of the Code may also be reported to our corporate whistleblower reporting channels, which can be found at [Corporate Guidelines / Compliance - ALTANA AG - ALTANA AG](#).

If the supplier does not comply with this Code, the supplier shall take necessary corrective action in a timely manner, as may be directed by ALTANA. If the supplier fails to comply with this Code, then ALTANA may take action against the supplier, including suspending or terminating suppliers' activities as one of ALTANA suppliers.