

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 Corporate Code of Conduct.

The purpose of this document is to make our suppliers aware of our commitments and expectations.

We expect our suppliers to comply with applicable laws. Further additional expectations are formulated in this document. We expect our suppliers to take responsibility for ensuring their conduct conforms to these principles.

Suppliers shall ensure their own compliance with the Code as well as compliance throughout the upstream value 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.

By entering into a business relationship with ALTANA, suppliers accept and agree to fully comply with the Code.

I. HUMAN RIGHTS AND ENVIRONMENT

Child labor

- Suppliers may not use, be complicit in, or benefit from child labor and the worst forms of child labor.

Forced labor

- Suppliers must not use, be complicit in, or benefit from any forced or involuntary labor (including modern slavery, debt bondage, and human trafficking).

Slavery

- Suppliers must not use, be complicit in, or benefit from any form of slavery, slavery-like practices, debt bondage (including extreme economic or sexual exploitation and humiliation).

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).

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).

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.

Adequate living wage

- 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.

Hazardous soil alterations, water or air pollution, harmful noise emissions or excessive water consumption

- Suppliers shall not cause hazardous soil alterations, water or air pollution, harmful noise emissions or excessive water consumption.

Unlawful eviction or unlawful dispossession of land, forests or waters

- Suppliers must not use, be complicit in, or benefit from any unlawful eviction or deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

Illegal deployment of security forces

- Suppliers that deploy their own security forces or commission private security service providers shall ensure that they respect internationally recognized human rights in their operations.

Production and handling of mercury

- Suppliers shall not manufacture or use products containing mercury or mercury compounds and shall treat mercury waste in accordance with the provisions of Article 11(3) of the Minamata Convention.

Production and use of persistent organic pollutants

- Suppliers shall not manufacture or use persistent organic pollutants.

Export and import of hazardous waste

- Suppliers shall handle, collect, store and dispose waste in environmentally sound ways and shall comply with the Basel Convention regarding export and import of hazardous waste.

ALTANA has implemented a risk management system (including risk analysis, preventive measures, remedial measures, complaint procedure, assessment of effectiveness, and reporting) to minimize particular risks for human rights and the environment and to prevent or end breaches of obligations relating to human rights and environmental issues.

II. UN GLOBAL COMPACT

As ALTANA Group, we are a member of the United Nations Global Compact. Therefore, our suppliers must respect the Global Compact's 10 principles in the areas of human rights, labor, environment, and anti-corruption, in particular those areas beyond the scope of the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz).

- Suppliers shall continuously strive to minimize greenhouse gas emissions.
- Suppliers shall protect natural ecosystems and ensure that they do not cause any changes, deforestation or damage to natural forests and other ecosystems (biodiversity).
- Suppliers shall minimize the amount of waste they generate by re-using or recycling to minimize environmental impact.
- Suppliers shall strive to reduce their energy and water consumption to minimize their operations' impact on the environment by setting, monitoring, and reviewing reduction targets.
- Suppliers shall promote renewable energy sources.

- Suppliers shall comply with applicable laws and regulations, including requirements relating to anti-corruption (no active or passive corruption).
- Suppliers shall not solicit, accept, offer, provide or authorize bribes of any sort either directly or indirectly.

III. FURTHER ESG RELEVANT TOPICS

ENVIRONMENT

- Suppliers who process animal-based products shall implement standards and best-practice methods for the welfare of the animals along the entire supply chain.
- Suppliers 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.
- Suppliers shall conduct business in a responsible way with as little impact on the environment as possible. This includes 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 for those areas that go beyond what is listed above.

SOCIAL

- Suppliers shall not tolerate physical punishment, unlawful detention, or physical, sexual or verbal harassment or abuse for those areas that go beyond what is listed above.
- 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.

GOVERNANCE

- Suppliers shall avoid any conflicts of interests with their obligations to ALTANA and take reasonable steps to declare and manage any conflicts, including in respect of those involving their employees.
- Suppliers must refrain from any activities that could harm ALTANA's company image.
- Suppliers shall protect the privacy of individuals and the security of confidential assets and information in a conscientious and appropriate manner.

IV. A) CONFLICT MINERALS

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.

IV. B) FURTHER MATERIALS OF CONCERN

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.

V LEGAL COMPLIANCE

- Suppliers shall protect the privacy of individuals and the security of confidential assets and information in a conscientious and appropriate manner.
- Suppliers shall not tolerate or profit from criminal tax evasion, money laundering, anti-competitive practices, or terrorist financing.
- Suppliers shall comply with applicable tax and duty regulations (“Tax Honesty”).
- Suppliers shall comply with applicable foreign trade regulations.
- Suppliers shall respect intellectual property rights of third parties.
- Suppliers shall not use counterfeit or copied products.

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 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](#).

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ALTANA AG



Dr. Tammo Boinowitz
Member of the Board



Jörg Mahn
Chief Sourcing Officer