

Code of Conduct

Introduction

Our managers are responsible for knowing the business principles, engaging with them, explaining them to employees and endeavouring to ensure that the values become part of the way we work together in the company. In this way, we create a sustainable and ethically correct corporate culture. They are multipliers and are responsible for compliance and implementation.

The Business Principles apply to everyone who is part of Buzil or one of its subsidiaries, regardless of job, role or function. We are all responsible, individually and collectively, for acting with integrity, transparency and commitment. This is essential in order to build and maintain a relationship based on trust with all our stakeholders. They are also aimed at our suppliers and business partners, as we have set ourselves the goal of complying with these principles along the entire value chain. If we notice that these principles or an internal regulation derived from them are not being fully observed, we take immediate action.

If there are different legal, normative or other requirements for one or more aspects, we comply with the highest standard in each case. If a law prevents a more demanding approach, we fulfil the better standard as far as possible within the framework of the legislation.

Principles, objectives and application

1. Sincerity

We avoid any actions that could be construed as unfair. This applies in particular to conflicts of interest or situations from which Buzil could gain unlawful advantages. We demand personal integrity from all our employees. Professional decisions must be based solely on the interests of Buzil and must not be influenced by personal interests. This means:

- Any kind of bribery is prohibited. We do not allow third parties to be offered or granted benefits or advantages of any kind in order to influence (e.g. official, administrative or judicial) decisions or to obtain unlawful advantages for the company. Likewise, the acceptance of benefits or advantages is prohibited if this could cause a Buzil employee to violate his or her duties or obligations.
- We do not or accept gifts, hospitality or other inducements that could reward or influence a business decision.
- We openly address potential conflicts of interest in which personal interests could take precedence over the interests of the company and we avoid such situations.

2. Commitment to our employees

Our employees are Buzil's most valuable asset. Their enthusiasm and commitment are indispensable. With the help of our management system for occupational health and safety and our professional HR work, we ensure that our employees are provided with a high standard of safety at work, that they stay healthy, that they can develop their skills and that they suitable work equipment at their disposal. There are also various ways for employees to get in touch with management or the HR department.

Our information cascades ensure that information can be quickly disseminated topdown and bottom-up within the company.

We support the professional development of our employees and encourage them to expand their competences and skills. To this end, we provide employees with the tools they need for continuous professional development. Our selection, training, recruitment and promotion processes are based on clear criteria. What counts are skills, competences and professional performance. We explain to our employees how we assess their work in the context of achieving the company's goals. We encourage them to get involved in the appraisal process so that we can all continue to improve professionally. We also aim to contribute to the personal development of our employees by providing training, information, resources and tools in order to enable them to balance their professional and personal lives. In return, we expect our employees to show personal commitment and a willingness to develop. Standing still is a step backwards for each of us and for Buzil.

We ensure that remuneration is fair and in line with the conditions of the local labour market.

We are committed to ensuring that our employees can fulfil their work in their weekly scheduled working hours. Wherever possible, any overtime worked within the scope of the legal requirements should be counterbalanced for the purpose of recovery. If this is not possible, this overtime can be paid out in accordance with the collective agreement.

We provide all employees at the plant with free drinks and unrestricted access to hygiene and sanitary facilities.

Occupational safety serves to maintain health and is therefore our greatest asset. We ensure the highest possible level of safety by having our occupational safety management certified. In the course of this, we explain to every employee and, if necessary, provide practical training on: behaviour in emergencies (e.g. fire prevention, damage limitation), handling electricity, maintaining the structural fabric of the building, safe handling of our chemical raw and auxiliary materials and the handling of equipment and machines.

We guarantee all employees the opportunity to exercise their rights and do not tolerate forced labour, threats, coercion, harassment, abuse, discrimination, violence, intimidation or child labour in our working environment. We guarantee our employees the right to belong to a trade union of their choice and do not tolerate in any way reprisals or hostile behaviour towards employees who involve in trade union activities.

3. Diversity and equal opportunities (=equal rights)

We are convinced that heterogeneous work teams are important in order to do justice to the reality of the society in which we operate and to respond to its needs with greater foresight. We therefore promote heterogeneous teams and guarantee equal opportunities. We treat all people fairly and impartially, without prejudice based on skin colour, nationality, ethnic origin, religion, gender, sexual orientation, level of education, age, disability or family obligations.

Further information can be found in the respective guidelines.

4. Respect for human rights

We respect and support internationally recognised human and labour rights. This also applies to the United Nations Universal Declaration of Human Rights and the rights enshrined by the International Labour Organization in its eight core labour standards.

Further information can be found in our Human Rights Policy.

5. Fulfilling our customer promise

Our customers not only expect us to provide safe and high-quality products and services, but also to communicate with them in a transparent and honest manner. For each and every Buzil employee, the fulfilment of this obligation must always come first. Our aim is to a relationship characterised by trust and mutual benefit. This includes clearly communicating what we are unwilling or unable to deliver. We put our customers at the centre of everything we do. That is why we want to understand their views and needs, fulfil them wherever possible and measure their level of satisfaction. We support our customers with products and services to ensure the health and safety of their employees.

Our customer promise is: Really clean for a future worth living

We only offer what we can deliver. When selling our products and services, we provide truthful, relevant and clear information. We ensure that our products and services fulfil all the specifications that are necessary and that we have advertised.

We check and ensure that the products we sell fulfil all standards with regard to manufacturing quality and safety. If, despite all due care, we identify a safety risk, we communicate this and appropriate steps to eliminate it immediately.

We provide our customers with various communication channels through which they can contact us if they are dissatisfied with our products. We respond to justified claims promptly and prudently.

6. Responsible supply chain management

Our products and services are the result of mutually beneficial relationships with our business partners and suppliers. We always endeavour to ensure that these relationships are balanced and characterised by mutual trust and that they generate quality, innovation and satisfaction for the end customer.

We are committed to transparency and professionalism towards our business partners and suppliers.

In order to fulfil our responsibility within the entire value chain, we require our business partners and suppliers to comply with our Business Principles or other comparable principles and our Supplier Code of Conduct.

Our employees make purchases or place orders as part of their role. It is important that we take personal responsibility, work with responsible suppliers and partners and ensure through appropriate controls that they not only deliver high-quality products or services, but also always act responsibly towards their stakeholders.

Further information can be found in our purchasing guidelines.

7. Confidentiality

Confidentiality must be maintained with regard to internal matters that are not made public. This also applies to inventions and other expertise. This is the foundation for sustainable success and a guarantee for our future. We therefore do not pass on any new findings or company secrets to third parties in any form. This also applies after termination of the employment relationship.

8. Data protection

Ensuring and safeguarding data protection in accordance with the EU GDPR is an essential business foundation for us and is of paramount importance in the organisation of our services. We are committed to complying with all regulations that apply in the markets in which we operate. In all cases, our customers and employees must know what personal data we collect and how and for what purpose we use it. They must also have the opportunity to influence its use.

We do not use confidential information for our own benefit or for the benefit of third parties. We guarantee confidentiality and the legally prescribed control mechanisms and processes in our activities.

Further information can be found in our privacy policy.

9. Protection of company capital

We maintain and protect our physical, financial and intellectual capital and utilise it as efficiently as possible.

10. Dealing with gifts and invitations

When dealing with business partners and authorities, employees may only grant or accept benefits if this in no way gives the impression of influencing business processes. The appearance of corruption must be avoided at all costs. Private and business interests must be kept completely separate. To this end, the following principles are intended to guidance in day-to-day business.

Gifts from and to business partner(s):

Gifts must be clearly recognisable as gifts (company logo, an enclosed greeting card, etc.). Low-value promotional gifts and courtesy gifts (value limit for Germany: EUR 50 max., for other countries according to local regulations) are permitted without authorisation. Gifts of a higher value require the prior approval of management. If a Buzil employee has received a gift that is inappropriate according to this guideline and that they could not refuse for reasons of politeness, the gift is to be donated to a charitable cause in consultation with the management.

Gifts of money of any kind (cash, bank transfers, unauthorised credit) are prohibited and may not be accepted.

Personal benefits (e.g. holiday trips, services) and indirect benefits to family members or other related parties are not permitted.

Gifts to public officials:

Gifts to public officials or to persons or organisations that perform public duties involve a high risk.

Bribery of a public official is a criminal offence and is prosecuted in all countries. As a general rule, gifts to public officials are prohibited.

11. Invitations

Business meals: In general, business meals do not require management approval – however, they must be reasonable in value, conform to customary social behaviour and rules of courtesy and avoid any appearance of impropriety (e.g. in Germany under EUR 50 per person).

Invitations to entertainment events must always be authorised in advance by the management.

Invitations from or to business partners may not include spouses or partners. Exceptions are possible if such an event is usually attended in the company of a partner (e.g.: dinner with dancing, visit to the opera). In any case, the prior consent of the management is required.

As with gifts, invitations to meals or entertainment events for public officials also carry a high legal risk and should be avoided if possible. If an invitation is desired for reasons of courtesy and is legally permissible, the invitation should be to a simple restaurant. If the value of the meal remains below the locally applicable value limit (e.g. in Germany below EUR 25 per person), no prior authorisation by the management is required. In all other cases and in cases of doubt, this must be obtained in advance.

Particularly lavish and luxurious gifts and invitations may neither be offered nor accepted and cannot be authorised.

12. Sponsoring and donations

As a regional family business, Buzil's sponsoring and donation activities primarily relate to people and projects in the environmental, cultural and social sectors with a specific local/regional connection. Individual sponsorships in the context of a professional activity (sport, culture, social affairs...) are not the primary objective of our sponsoring activities. The sponsoring activities must be in line with the corporate philosophy and must not have a political or similar character or run counter to the concept of sustainability (e.g. motorsport).

The following are excluded from funding:

- Political parties and their support organisations
- Religious movements and organisations
- Projects that are associated with high risks (e.g. danger to humans, animals or the environment) or do not pursue a socially adequate objective
- Requests where the use of funds is non-transparent and unclear

Sponsorship and donations are made independently and voluntarily. Whether a sponsorship is approved is decided by the management on a case-by-case basis. A legal claim is excluded.

13. Prohibition of money laundering

We reject transactions involving money that has been criminally acquired and is to be introduced into the normal economic cycle. We expect the applicable laws and regulations on combating the financing of terrorism to be observed.

14. Political neutrality

As a company, we are committed to democratic principles.

Under no circumstances, we oblige our employees to take a position directly or indirectly in favour of or against a political party.

15. Tax & administrative transparency

We manage our tax affairs honestly, transparently and in compliance with the law. We fulfil our obligations to properly pay the legally prescribed taxes in all countries in which we are active in. In doing so, we contribute to their social and economic progress.

We also fulfil the administrative, legally prescribed requirements honestly, transparently and in accordance with our obligations. Buzil has nothing to hide.

16. Fair competition

We believe in free and fair competition and are committed to fair business practices in all our markets. If a market participant behaves unfairly towards us, we know our position and our rights and to find a fair solution to the injustice with them. Fair also means that the conflict is resolved among ourselves without leaking sensitive information the outside world.

17. The Buzil reporting channel (whistleblowing procedure)

We provide our customers, employees, suppliers, partners or other stakeholders with an anonymous, independent and secure reporting channel through which doubts or reports concerning compliance with this guideline and the Human Rights Policy can be raised. Buzil has a member of the Works Council for this purpose, who is the point of contact for all stakeholders. The duty of confidentiality ensures that the identity of a whistleblower is not disclosed.

Incoming communications are followed up and responded to carefully and respectfully. If necessary, action will be taken within a reasonable period of time. If it is confirmed that an employee has deliberately violated our business principles, we reserve the right to appropriate disciplinary, legal or labour law action against them.

Whistleblowing information can be submitted internally and externally:

Internal whistleblowing complaints: Mrs Petra Schedel is the confidential contact person at Buzil. Write an e-mail to petra.schedel@buzil.de with the subject: „Whistleblow“. Your information will be treated in the strictest confidence. Depending on the nature of the report, appropriate action will be taken.

External whistleblower complaints: There is an e-mail address for whistle blowers (whistleblowing@buzil.de) on the Buzil website under the menu item Contact. The information is treated in the strictest confidence. Depending on the nature of the report, appropriate action will be taken.

Whistleblowers are protected against dismissal, harassment or other forms of retaliation.

Whistleblower information is treated confidentially and forwarded to the relevant institutions and authorities if necessary.