

Supplier Code of Conduct

Sustainability is a key element and integral part of our business strategy.



Glossary

The glossary explains or defines selected terms, organisations or concepts, which are used in this CURRENTA Supplier Code of Conduct.

Hazardous materials

As defined in the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), which was set up by the UN Economic Commission for Europe (UNECE).

International Labour Organisation (ILO)

The ILO is a UN agency, which brings together governments, employers and employees of UN member states to set labour standards, develop policy guidelines and devise programmes promoting dignified working conditions for all women and men.
[URL: www.ilo.org]

Conflict minerals

According to the current definition, conflict minerals include the metals tantalum, tin and tungsten, which are derivatives of the minerals cassiterite, columbite-tantalite and wolframite, as well as gold. They are referred to as "3TG".
[URL: www.responsiblemineralsinitiative.org]

Suppliers

Suppliers are all third parties as well as all companies affiliated with the third party according to Section 15 of the German Stock Corporation Act (AktG), which supply goods

and services to CURRENTA, and the representatives or subcontractors of these third parties.

Human trafficking

Human trafficking involves the recruitment, housing or movement of people for exploitation by the use of threats, fraud or coercion, and forcing people into involuntary work.

Employees

By the term employees CURRENTA means the entire staff employed or appointed by a supplier.

Sustainability standards and certifications

Voluntary guidelines and standards - usually verified by a third party - on ecological, social, ethical and safety-related aspects, based on which companies prove their own sustainability or the sustainability of their products in specific areas. Examples are the Forest Stewardship Council (FSC), the Roundtable on Sustainable Palm Oil (RSPO), the Responsible Minerals Initiative, the Rainforest Alliance etc.

Personal information

Personal information is any information that relates to an identified or identifiable natural person.

Referenzen

Circular Economy

<https://www.ellenmacarthurfoundation.org/>

International Labour Standards (ILO)

<http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm.ilo.org>

OECD Guiding Principles for Chemical Accident, Prevention, Preparedness and Response

<http://www.oecd.org/env/ehs/chemical-accidents/Guiding-principles-chemical-accident.pdf>

Responsible Care Global Charter

<https://www.icca-chem.org/responsible-care-global-charter/>

United Nations Global Compact (UNGC)

<http://www.unglobalcompact.org>

United Nations Guiding Principles

https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

Universal Declaration on Human Rights

<http://www.un.org/Overview/rights.html>

Currenta-Group Supplier Code of Conduct

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Preamble



CURRENTA lives sustainability. Every day.

For us, sustainable means contributing to environmental and climate protection, enabling economic success and securing jobs, personal freedom rights and social development. All the goals mentioned above are of equal importance and should support the sustainable development of the chemical industry in Germany.

CURRENTA takes on a leading role here. We support the Initiative Responsible Care and as one of the first companies in the industry-wide Sustainability Initiative Chemistry³ of the German Chemical Industry Association (VCI), the Mining, Chemical and Energy Industries Union (IG BCE) and the German Chemical Industry Employers' Association (BAVC) have taken part and campaigned for sustainable development. We actively implement the standards of the German Supply Chain Due Diligence Act.

Also, as employer, business partner and good neighbour, CURRENTA sets standards in many respects. For example, we focus on energy supply and waste disposal in a sustainable way, minimise environmental risks, and as managers and operators of the CHEMPARK, we work together with the local companies to ensure an efficient network. With our targeted investments in technology, infrastructure and logistics, we contribute to the attractiveness and safeguarding of CHEMPARK locations responsibly. Furthermore,

we offer programmes to remain attractive for our employees and secure jobs in the region. With numerous dialogue opportunities, projects and collaboration, we show the importance of our close environment.

CURRENTA promotes industry acceptance in the whole of North Rhine-Westphalia (NRW). With our commitment, strategic focus and investments, we also want to be a reliable partner in the future for our customers, our employees and our region - together with our suppliers.

The principles formulated in this Supplier Code of Conduct are based on the proven principles of sustainability and form an essential part of the supplier selection and assessment.

We expect our suppliers to also implement these standards in the upstream supply chain and in particular to comply with and continually implement all requirements and specifications of the German Supply Chain Due Diligence Act (LkSG). If a supplier violates these principles and does not agree to an improvement plan or fails to implement this, CURRENTA reserves the right to take a new decision about continuation of the business relationship.

CURRENTA thus makes this Code of Conduct available to its suppliers with the aim of strengthening the shared understanding of how these principles should be implemented in everyday business.

Ethics

In order to fulfil social responsibility, the suppliers must act ethically and morally. The ethical requirements cover the following aspects:

Integrity in the course of business

The suppliers have to observe the legal interests specifically protected in Section 2 Paragraph 2 and 3 of the German Supply Chain Due Diligence Act (LkSG) and take adequate measures in everyday business, to prevent violation of these legal interests. The suppliers must specifically prohibit corruption, extortion, child and forced labour, breach of trust, embezzlement and money laundering in any form and must not practice or condone this.

Suppliers may not offer or accept any bribes or other unlawful incentives (e.g. kickbacks) with business partners or officials. Suppliers must not offer CURRENTA employees any gifts or other donations for personal gain, which could be viewed as bribery. Gifts or entertainment in general must not be used to influence a business relationship unfairly and must not violate any applicable laws or ethical standards.

Conflict of interests

The suppliers must inform CURRENTA of any situation which could lead to a conflict of interests, e.g. if employees of CURRENTA gain professional, private and/or considerable financial advantages or have shares in a company of the supplier.

Implementation of a complaint hotline against illegitimate behaviour

The suppliers must facilitate and set up channels of communication for their employees and third parties, through which they can submit complaints or report on possible illegitimate behaviour, without fear of repression, intimidation or harassment. Every notification should be treated as confidential. The suppliers must make investigations on the basis of the reports and take measures if necessary. They must inform CURRENTA on any legal action, administrative investigations or prosecutions, which could impact their work for CURRENTA or damage their own or CURRENTA's reputation.

If a supplier or one of its employees at any time considers that an employee of CURRENTA has violated these principles, the supplier or their employees should share its concerns via our Compliance Hotline on our homepage.

Fairness in competition

The suppliers must behave fairly in competition and respect the applicable antitrust laws.

International trade controls

The suppliers must comply with the export control regulations applicable for their business and provide customs and other authorities with correct and truthful information on request. In particular, breach of the prohibitions in Section 2 Paragraph 3 LkSG must be prevented.

Protection of confidential information and intellectual property rights

The suppliers must use confidential information appropriately and protect it accordingly. Suppliers must ensure that sensitive data and the applicable intellectual property rights of their own employees and business partners are safeguarded.

Suppliers may not use the name or brands of CURRENTA or our subsidiaries or products for promotional purposes without the prior written consent of CURRENTA.

Nondisclosure and protection of data

Information systems of suppliers, which contain confidential information or data of CURRENTA, must be managed appropriately and be protected against unauthorised access and unauthorised use, disclosure, alteration or destruction of data. Suppliers must only collect personal information for legitimate business purposes, only use it in a legal, transparent and safe manner and only pass it on to persons authorised to access it. They must protect the information according to the safety regulations, they must only store it for as long as necessary and must require third parties with access to personal information to protect it.

Conflict minerals

The suppliers must ensure that no products are supplied to CURRENTA containing metals whose base minerals or derivatives originate from a conflict region where they directly or indirectly contribute to financing or supporting armed groups, or where they cause or encourage human rights violations. The suppliers also have to ensure that violations of prohibitions in Section 2 Paragraph 3 of LkSG are prevented.

Interaction with employees and other persons

The suppliers must respect human rights within their companies and deal with their employees fairly and respectfully. This includes the following aspects:

Prohibition of child labour

We condemn child labour in our supply chain. Suppliers must avoid any type of child labour in their companies. The definition of child labour is based on the core work standards of the International Labour Organisation¹ (ILO) as well as the principles of the UNGC and the regulations in Section 2 Paragraph 2 No 1 and 2 of LkSG. If a local law stipulates a higher legal minimum age for workers or a longer compulsory education, the higher age shall apply.

Free choice of workplace

We do not tolerate slavery, servitude, forced labour - of any form at all - and human trafficking in our supply chain. Nor is debt slavery, indentured servitude and involuntary prison work accepted. Practices such as unreasonably withholding of personal property, passports, wages, training certificates, work documents or other documents are not acceptable. Suppliers agree to respect the prohibitions of Section 2 Paragraph 2 No. 3 and 4 of LkSG and prevent any violations.

Working hours, wages and other benefits

Suppliers must comply with the respective applicable legal rules on working hours as stipulated by the ILO Standards. Payment must be made to the employees on a regular basis, on time and in full, according to the applicable laws, and payment must be in accordance with the applicable national laws. Remuneration and other benefits should allow the employees and their families a reasonable standard of living. Deductions from wages as disciplinary measures must only be permitted under the applicable national law; any possible claim for damages on a contractual or legal basis shall remain unaffected. The supplier will be expected to offer their employees a fair and competitive remuneration and other benefits, and advocate equal pay for equal work, but in any case, implement the requirements of Section 2 Paragraph 2 No 8 of LkSG. It is recommended that suppliers offer their employees adequate further training and educational opportunities.

Freedom of association

Suppliers must maintain open and constructive communication with their employees and employee representatives. In accordance with local laws, the suppliers must observe the right of employees to associate freely, to form and join trade unions, to appoint an employee representative, to form a works council and to be involved in collective bargaining.

Suppliers must prevent violations of Section 2 Paragraph 2 No 6 of LkSG. Suppliers must not discriminate against employees who are engaged as employee representatives, meaning they can carry out their jobs without fear of repression or discrimination.

Diversity and inclusion

Equal treatment of all employees must be a fundamental principle of the corporate policy of suppliers. The suppliers agree to prevent unequal treatment or discrimination of employees according to Section 2 Paragraph 2 No 7 of LkSG. Discriminatory behaviour typically refers to – consciously or unconsciously – irrelevant personal features such as age, health status, disability, ethnic background, marital status, gender, gender expression and identity, genetic information, national origin, physical features, political opinion and allegiance, pregnancy, religion and ideologies, social origin, sexual orientation, membership in a trade union or another unlawful criterion. Suppliers must ensure that their employees are not harassed in any way.

CURRENTA encourages suppliers to create an inclusive and supportive working environment by respecting diversity in the selection of their employees. Also, CURRENTA encourages its suppliers in maintaining an active programme for supplier diversity, which supports cooperation with companies with a diverse ownership structure.

Fair treatment

Suppliers must treat their employees fairly, free of sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse, as well as the threat of any such treatment. In addition, it is expected that suppliers do not terminate employment contracts for no reason and that they do not declare the termination of an employment contract lawful based on the work performance of individual employees, without providing clear evidence. The employees can freely choose when they want to cease working for the employer subject to the statutory notice period. They will be remunerated on time and fully for work performed before they leave the company under the applicable laws.

Local population

Suppliers should take on responsibility for the communities in which they operate, by responding to residents' concerns and ensuring safe and healthy living conditions. They are encouraged to create jobs, provide education and training opportunities as well as infrastructure development at local level. Suppliers agree to respect the prohibitions concerning these under Section 2 Paragraph 2 No. 9 - 11 of LkSG.

¹Agreement about the minimum age for admission to employment 1973 (No. 138); Agreement on the prohibition and immediate measures on the elimination of the worst forms of child labor, 1999 (No. 182).

Health, safety and environmental protection

The suppliers must make appropriate arrangements for the health and safety of their employees, customers, visitors, contractors and other persons who can be affected by their activities. In addition, they must conduct business in an ecologically responsible and resource-saving way. This entails the following aspects:

Health and safety in the workplace

The suppliers must protect their employees adequately against chemical, biological and physical hazards. Physically demanding jobs and conditions in the workplace, as well as risks arising from the use of existing infrastructure in the workplace, must be managed in a way that protects employees from hazards. The suppliers must ensure adequate controls, safe work processes, adequate maintenance and the required technical protective measures, in order to reduce health and safety risks in the workplace and avoid accidents and occupational illnesses. Additionally, suppliers must provide their employees with suitable protective clothing. Safety information on the identified risks in the workplace or hazardous substances² – including components in intermediate products – must be provided to employees for training and protection. Minimum requirements for a safe and healthy work environment include the provision of drinking water, sufficient lighting, appropriate room temperature, good ventilation, sanitary facilities and, if required, also safe and healthy company accommodation.

Process reliability

The suppliers must use safety programmes to manage and maintain their work processes in accordance with the applicable safety standards. The programmes must be adapted to the business premises and the process risks. The suppliers must communicate, disclose and control risks inherent in processes and products in a reasonable manner, in order to ensure that the third parties concerned or potentially concerned are protected. Furthermore, major incidents must be promptly analysed and communicated. In the case of dangerous plants and processes, suppliers must regularly conduct specific risk assessments and take measures to prevent incidents, for example the leakage of chemicals, fires or explosions.

Product safety

The suppliers must adhere to product safety regulations, label their products properly and communicate the requirements for handling their products. When necessary, they must provide the parties involved with the applicable documentation with all required safety-related information on all hazardous substances. This includes product information, safety data sheets, registration and permission certificates,

uses and exposure scenarios. The suppliers should proactively and transparently share information on the health, safety and environmental aspects of their products with all parties involved.

Emergency prevention, risk information and training

The suppliers must provide their employees and contractors with safety information on the workplace risks identified, and train them accordingly, in order to ensure adequate protection. The suppliers must identify and assess relevant risks and emergency situations in the workplace, in the neighbouring environment and in the accommodation provided by the company. Its possible effects must be minimised by the provision of adequate fire prevention, effective emergency plans, regular exercises and the associated reporting procedures.

Waste and emissions

The suppliers must guarantee safety and compliance with regulations in handling, storage, transport, disposal, recycling and recovery of waste, exhausts and wastewater. Activities, which can have negative consequences on the health of people or on the environment, must be handled, measured and controlled in a reasonable way. The release of hazardous substances must be minimised. Particular caution is necessary in the case of active substances. The supplier must prevent or keep as low as possible the accidental spillage and fugitive emissions of hazardous substances.

Resource and climate protection

The suppliers must use natural resources (e.g. water, energy sources, raw materials) economically and preserve these. In order to preserve renewable natural resources, suppliers should foster the use of generally accepted sustainability standards and certifications developed by various social players. Negative effects on the environment and the climate, which are caused by the suppliers themselves or within their supply chain, must be minimised or prevented at the point of origin. Its practices should correspond to the principles of the circular economy, such as material reduction and substitution as well as the return, shared use, maintenance, recycling, remarketing, reprocessing, revision and recycling. The suppliers should encourage the development and use of ecological and climate-friendly products, processes and technologies. The suppliers must also continuously ensure and demonstrate ecological improvements. This includes the reduction of raw material and energy consumption, emissions, wastewater, noise emissions, waste and the reliance on natural resources and hazardous substances - with the help of clear goals and improvement strategies.

² According to the United Nations Globally Harmonized System (UNGHS)

Quality

The suppliers must provide high quality, safe and effective goods and services, which are in accordance with the applicable laws and regulations. This includes the following aspects:

Quality requirements: protection and product counterfeiting measures

The suppliers must fulfil the generally recognised quality standards or contractually arranged quality requirements, in order to provide goods and services, which meet the needs of CURRENTA and its customers, that provide the guaranteed services and are safe for the intended use. The suppliers must promptly address all critical points, which could negatively impact the quality of goods and services. The suppliers must inform CURRENTA of any modifications in the production or supply process, if these can have consequences on the specifications of goods supplied or services provided.

The suppliers must ensure adequate protective measures within their supply chain. They must also ensure the integrity of deliveries to CURRENTA – from the place of origin to destination.

The suppliers must introduce all necessary and appropriate measures in their area of responsibility, so neither CURRENTA products, their workable components or raw materials, nor the corresponding know-how reach the hands of counterfeiters, smugglers, thieves or other unauthorised third parties or even leave the legitimate supply chain. Suppliers must immediately check the relationship with the third party, if they receive any indication that they are involved in the manufacture or sale of counterfeit products unintentionally through the activities of the third party, e.g. of products intended for export, which are considered as counterfeits in the destination country. CURRENTA expects its suppliers to support the investigation and prosecution of activities related to counterfeit products.

Governance and management systems



The suppliers must introduce effective management systems and a governance structure, which support compliance with the applicable laws in their companies and promote continual improvement regarding the expectations presented in this Code of Conduct. This includes the following aspects:

Legal and other requirements

The suppliers must be aware of and comply with all applicable international, national and local laws and regulations – particularly the specifications of the German Supply Chain Due Diligence Act, contractual arrangements and internationally recognised standards. The suppliers must also align their practices to the generally recognised industry standards, obtain all applicable approvals, certificates, licenses and permits and keep these up to date, and carry out their work in accordance with the restrictions and requirements of the approvals at all times.

Obligations and responsibility

The suppliers must comply with the principles from this Code of Conduct, by providing the appropriate resources in their companies and incorporating all the principles relevant to them in policies and procedures. If the suppliers detect any violations of the principles from this Code of Conduct in their own business operation or in their upstream supply chain, appropriate remedial action must be taken immediately.

Communication of sustainability principles in the supply chain

The suppliers must also implement the principles outlined in this Code of Conduct in their upstream supply chain.

Systems, documentation and evaluation

Suppliers must develop, implement, apply and maintain management systems and controls in accordance with the legal requirements - in particular the LkSG - in connection with the content of this Supplier Code of Conduct. They are obliged to appoint a person responsible in accordance with Section 4 Paragraph 3 of LkSG and upon demand to provide CURRENTA with information on this. They must have the necessary documentation to prove conformity with the principles of this Code of Conduct. By mutual agreement of

the parties, the documentation can be reviewed by CURRENTA.

Risk management

The suppliers must introduce instruments for regular identification, assessment and control of risks in all areas, which are covered in this Supplier Code of Conduct, and by referring to all applicable legal requirements – in particular Section 4 ff of LkSG.

Business continuity

The suppliers are encouraged to establish appropriate business continuity plans for operational activities that support the business of CURRENTA.

Continuous improvement

The suppliers must demonstrate their commitment to continuous improvement, by defining their performance targets, carrying out implementation plans and taking the necessary measures to resolve any deficiencies, which are detected during internal and external audits, inspections and management reviews. The suppliers must in any case comply with the legal requirements of LkSG in periodic and ad hoc reviews of their own measures.

Training

The suppliers should develop, conduct and foster suitable training measures, in order to convey to their managers and employees an appropriate level of understanding of the relevant principles of this Supplier Code of Conduct, as well as the applicable laws, regulations and generally accepted standards.

Transparency and control

The suppliers are encouraged to report externally on their impacts on society and the environment, in accordance with the principles defined in this Supplier Code of Conduct.

Right to audit

The suppliers grant CURRENTA the right to assess its sustainability performance after prior notification within an appropriate period of time. The assessment will be carried out directly by CURRENTA or by a qualified third party, e.g. as an evaluation or review.

