



Georg Nordmann Holding

NORDMANN » ROWA GROUP

Code of Conduct

June 2023



Dear colleague,

We at Georg Nordmann Holding Aktiengesellschaft together with its subsidiaries (GNH Group) are a longstanding international family-owned organization with a great wealth of experience that stands for sustainable, innovative, and continuous growth. Anchored in our subgroups' visions each and every one of us contributes to our success:

NORDMANN:

To be the partner of choice in the international distribution of specialties and chemicals

ROWA GROUP:

A strong community setting standards for polymer materials and chemical industries

What matters to us is not only the results we achieve, but also how we get there and how we interact with one another along the way. That is why the GNH Group's work is driven by our four key values:

Responsibility, Performance, Guiding and **Passion.**

We stand for passion and responsibility in all we do, and we always act in the best interest of our stakeholders while faithfully assuring legal and ethical conformity in all aspects of our business.

Our way of working and decision-making at GNH Group is based on our key values. We believe they are also the core principles of everyone working with us, ensuring the continued existence and growth of our organization.

This Code of Conduct serves to guide all our actions and defines how we interact with one another, our business partners, the environment, and the risks we are faced with. When confronted with a dilemma situation, we trust that everyone who works for or on behalf of GNH Group will consider our values and use our reporting channels to seek help or to speak-up.

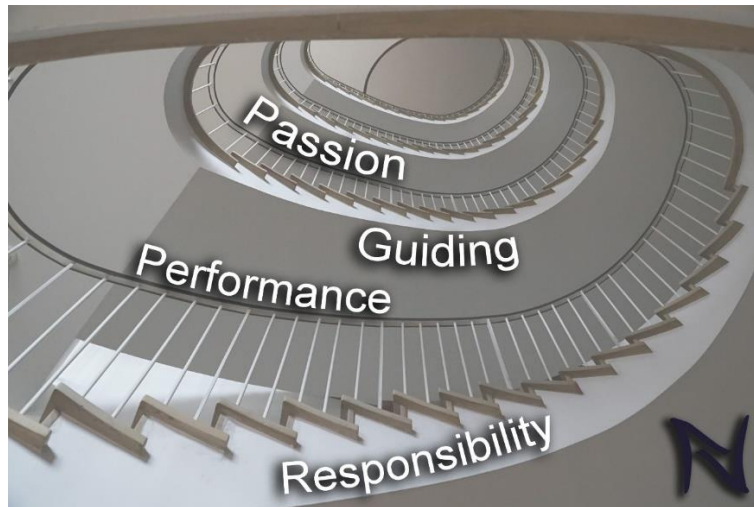
If you believe that any of the principles outlined in our Code of Conduct have been violated, please raise your concerns to one of your supervisor(s), those responsible for compliance within the respective GNH Group subsidiary, the Director Group Compliance, or our Integrity Line, through which reports can be submitted anonymously.

Our Code of Conduct is – without exception – binding for all of us in the GNH Group. For this reason, we ask each of you to familiarize yourselves with our Code of Conduct, set good examples, and remain ever committed to conducting business in an honest, fair, and respectful manner.

We count on your support and thank every one of you for the important contributions that you make day by day.

Irina Zschaler
Chief Executive Officer

Marco Bröning
Chief Financial Officer



Responsibility

When we interact with one another, with our stakeholders, trade, or produce new goods, we take Responsibility for our actions and how we present ourselves and the GNH Group. Together we are also responsible for our success, and for ensuring that no areas of concern remain unresolved.

Guiding

Within the GNH Group we work together and Guide one another in every situation to facilitate the best possible outcome while continuously valuing integrity, honesty, and transparency in our interactions.

Performance

We always strive for the highest level of Performance, to extend beyond our targets and deliver first-class products to our business partners.

Passion

And everything we do, we do with Passion! Passion is what motivates us to continuously improve our products, our business and ourselves. It is what thrives us to become better and what brought us to where we are.

We are committed to the principles of the United Nations Global Compact (UNGC). These form an integral part of our Code of Conduct and address the important topics of human rights, working conditions, environmental protection and anti-corruption.

1. Human Rights and Working Conditions

- 🌐 We are committed to upholding human rights. This is essential to all our business activities.
- 🌐 We strongly reject any kind of child or forced labour as well as exploitation.
- 🌐 We do not tolerate discrimination and we facilitate equal opportunities and equal treatment.
- 🌐 We ensure a safe and healthy working environment and avoid safety risks through foresight and sensible action.
- 🌐 We respect the applicable rights of representation of the social and economic interests of our employees, as well as applicable rights regarding minimum wages and working hours.



2. Legal Compliance

- 📄 We adhere to applicable laws and regulations, be they local, national, or international.
- 📄 We further ensure compliance with applicable trade and customs laws in connection with our cross-border business activities.
- 📄 We ensure that our financial reports comply with accounting standards and present a truthful reflection of our business activities.
- 📄 We endeavour to detect and prevent cases of misconduct and fraud.
- 📄 We are committed to fair competition.
- 📄 We ensure our financial and fiscal integrity.
- 📄 We expect the same from our business partners as we expect of ourselves, including our suppliers, and those who work on behalf of GNH Group. In cases of non-compliance with our Code of Conduct, we do not hesitate to end business relationships.



3. Environmental Protection

- We highly value environmental and climate protection efforts, as well as the protection of our natural resources.
- We focus on sustainability in the pursuit of our economic goals.
- We see protecting the environment, efficient energy use, effective resource management and the minimization of carbon emissions and waste as vital.
- We protect the environment by constantly advancing technologies, processes, and materials.



4. Fair Competition, Anti-Corruption and Conflicts of Interest

- We adhere to the rules of free and fair competition.
- We do not tolerate corruption or bribery in any form; neither do we offer, demand, or accept it. This also includes so-called facilitation payments.
- We only accept invitations, gifts, gratuities, or other benefits if they comply with the principles of legality, accountability, and appropriateness.
- We ensure that no conflicts of interest arise, which could pose a threat to the impartiality of our business activities.
- In cases of uncertainty and/or potential conflict with any of the principles outlined above, please inform and follow the guidance of your supervisor(s), those responsible for compliance within the respective GNH Group subsidiary, or the Director Group Compliance.



5. Anti-Money Laundering and Terrorist Financing

- We reject any activities linked to money laundering and/or terrorist financing.
- We carefully screen our business partners, including our suppliers and those who work on behalf of the GNH Group, against national and international sanction lists,



and we follow a defined due diligence process before entering into business relationships with them.

- 🌐 We observe sanction regimes applicable to our business activities and monitor sanction developments.

6. IT Security, Data Privacy and Personal Data Protection

- 🌐 We make use of digitisation to continuously innovate within the GNH Group and of appropriate security standards to protect our IT infrastructure.
- 🌐 We maintain confidentiality and protection of personal data from unauthorised access.
- 🌐 We process personal data only in accordance with applicable personal data privacy laws.
- 🌐 We protect the GNH Group's and our business partners' intellectual property and we will not share it with any unauthorised person or entity.
- 🌐 We also respect the intellectual property and copyright of others.



7. Product Safety and Responsibility

- 🌐 We make sure that all our products are handled in a safe manner and comply with legal requirements.
- 🌐 We are responsible for all our products and ensure the highest possible quality of our products.



8. Social Responsibility by Conviction

- 🌐 We exercise social responsibility on the basis of our convictions and engage in social activities for the betterment of our communities.
- 🌐 We do not engage in business related to weapons, or activities which could directly or indirectly contribute to drug trafficking.



9. Our Speak-up Culture

- ☞ We encourage you to speak up if you become aware of any potential violation of our Code of Conduct, and/or applicable laws and regulations.
- ☞ We do not allow any kind of retaliation against those who have reported concerns in good faith.
- ☞ We process and investigate reported concerns confidentially and impartially and take necessary actions if deemed necessary (“Lessons Learned”).
- ☞ Please report occurred or suspected violations of our Code of Conduct to your supervisor(s), those responsible for compliance within the respective GNH Group subsidiary, the Director Group Compliance, or by using our Integrity Line, through which reports can be submitted anonymously.



[Link to the Integrity Line](#)

Phone: +49 (0)30 9925 7146 – Company-Code 4125

For any additional questions or concerns regarding our Code of Conduct or suspected breaches, please feel free to contact our Director Group Compliance:

E-Mail: GNHGroupCompliance@nordmann-holding.com