

Code of Conduct of the LEHVOSS Group

(As of 31.3.2026)

1. The LEHVOSS Group

Lehmann&Voss&Co. and its subsidiaries (LEHVOSS Group) offer a broad portfolio of chemical and mineral specialities through the flexible combination of the three procurement channels distribution, trade and production. For our customers, we are a trustworthy partner offering high technical expertise, personal advice and individual services.

As a family business, we think and plan for the long term. Our actions are based on the values described in "[Our Values-Our Guidelines](#)". As a chemical company, we want to increase the value of the company without taking risks that threaten its existence or overlooking social, legal and ecological aspects. Everyone is responsible for ensuring that this is reflected in our daily actions. This makes our actions sustainable.

2. Policy Statement on Sustainability - also within the Supply Chain

The LEHVOSS Group is committed to responsible and sustainable business practices. As a signatory to the UN Global Compact, we support its [Ten Principles](#) on human rights, labour standards, environmental protection and anti-corruption and integrate them into our strategy, culture and daily operations.

We respect internationally recognized human rights and strictly prohibit child labour, forced labour, discrimination and unsafe working conditions. We require the same from all suppliers and business partners and expect them to implement appropriate due-diligence processes and provide transparent information on their environmental, social and governance practices.

Environmental responsibility is a key element of our corporate conduct. We aim to reduce greenhouse gas emissions across our operations, support the transition to low-carbon and resource-efficient products and continuously expand the use of recycled and renewable materials. We work to identify and address environmental risks — including those related to PFAS, microplastics and other substances of concern — and to reduce environmental impacts along our value chain.

To meet our sustainability commitments, we maintain risk-based due-diligence procedures covering our own activities and our supply chain. These include systematic risk assessments, supplier evaluations and preventive or corrective actions where necessary. Circularity, resource efficiency and climate resilience are integral elements of our long-term sustainability approach.

We comply with all applicable laws. Where local requirements differ from international standards, we strive to follow the higher ethical principles without conflicting with legal obligations. Our policy statement is updated regularly as standards evolve.

3. Compliance - Trust Through Honest and Compliant Business Conduct - a Personal Challenge and the Result of Joint Efforts

In all our business activities and decisions, we undertake to comply with the applicable laws and other relevant regulations of the countries in which we operate. We treat business partners fairly and honour contractual obligations, taking into account changing conditions.

This LEHVOSS Group Code of Conduct sets out the principles that guide our behaviour. It is designed to prevent situations that could undermine the integrity of our conduct or the confidence placed in us. These goals can only be achieved if all employees contribute to them.

All employees must follow applicable laws, internal policies and instructions. They are expected to act honestly and fairly and to avoid any conflict between their private interests and the interests of the LEHVOSS Group or of its customers.

Code of Conduct of the LEHVOSS Group

(As of 31.3.2026)

Managers serve as role models. They are responsible for their own conduct and for ensuring that employees in their area comply with all required procedures to avoid reputational and legal risks.

4. Respectful Treatment of Each Other - Prohibition of Discrimination - Development According to Performance and Potential

Our success is also essentially based on respectful interaction with each other. We are willing to learn from mistakes and value open and honest communication.

The essential criteria for the development of employees are performance and potential.

The LEHVOSS Group does not tolerate any form of discrimination or harassment of any kind in the workplace. This applies in particular to unfair treatment based on age, disability, origin, gender, political or trade union views, race, religion or sexual orientation. All employees are expected to foster a working environment characterised by respect, inclusiveness and professional conduct.

5. Protection of Personal Data and Confidential Information-Requests for Information from Public Authorities

We strictly observe all applicable regulations on the protection of personal data.

Confidential information and documents about customers, the LEHVOSS Group or employees must be protected in an appropriate manner from the insight of third parties as well as colleagues who are not involved.

Personal data may only be collected, processed or used to the extent necessary for specified, explicit and legitimate purposes. The use of data must be transparent for data subjects. Their rights to information and correction and, if applicable, to objection, blocking and deletion must be safeguarded.

In the technical protection against unauthorised access to data and information, an appropriate standard corresponding to the state of the art shall be maintained. The use, further processing or placing on the market of plagiarised products is not approved. The LEHVOSS Group cooperates with all competent public and supervisory authorities. Any communication in this regard may only be conducted via the employees appointed for this purpose.

6. Communication Towards Customers, Business Partners and the Public

All statements and reports of the LEHVOSS Group must be complete, honest, accurate, timely and understandable. Be it towards business partners, customers or the public.

This applies in particular to information and advertising material about our products. Information to business partners, customers or the public about the LEHVOSS Group, our products, our customers or business partners may only be provided by employees authorised to do so.

7. Social Networks

Anyone who speaks out in a public discussion or on social networks on topics that affect the LEHVOSS Group or our business partners should make it clear that they are acting as a private individual and have the interests of the LEHVOSS Group and business partners in mind.

Please consider that statements in emails or social networks can be made informally and spontaneously but are then nevertheless recorded and can be viewed for a long time by the recipient or the internet public.

Code of Conduct of the LEHVOSS Group

(As of 31.3.2026)

8. No Conflicts of Interest with Clients and Business Partners

The LEHVOSS Group strives for sustainable business relationships with its customers and business partners for mutual benefit.

Every employee must therefore ensure that the interests of our customers are taken into account in a fair manner. Interests of customers or business partners must not be given priority to the detriment of other customers or business partners.

9. Customer Complaints

Customer complaints provide valuable information about opportunities for improvement in our business and, if handled properly, offer an opportunity to strengthen or regain customer relationships.

The LEHVOSS Group takes care to ensure that all significant customer complaints are dealt with promptly in a fair and comprehensible manner.

10. Personal Conflicts of Interest

If employees become involved in conflicts between their personal interests and their professional duties or the interests of the LEHVOSS Group or our customers, this can damage the reputation of these employees and the LEHVOSS Group as a whole.

Employees should therefore avoid such situations in the interest of the LEHVOSS Group as well as in their own interest. The following applies in detail:

- No sideline activities that impair the time scope of the employment contract duties or the competitive interests of the LEHVOSS Group. Secondary activities must be reported in advance to the supervisor and the Human Resources Department. Honorary positions of limited duration do not have to be reported.
- No financial interests in companies that may be affected by professional decisions of the employee or the LEHVOSS Group (exception: listed stock corporations).
- The awarding of contracts to relatives, life partners or other related employees - if known - must be reported in advance to the superior and the Legal Department. This also applies to transactions with companies in which relatives are directly or indirectly involved.
- If possible, there are no direct reporting lines between children, parents, spouses or civil partners.
- No assumption of positions of entrepreneurial responsibility (e.g. member of a governing body, managing director, board of directors, supervisory board, advisory board) with customers, business partners or competitors without the prior consent of the management after notification of the Legal Department.

In case of doubt, please consult the Legal Department. The perception of third parties is decisive. Even the appearance of a personal conflict of interest is damaging.

11. Gifts, Business Lunches and Events

Gifts, business meals and events for informational, representational or entertainment purposes may be a legitimate means of establishing and supporting business relationships. However, they must never be used to gaining unfair business advantage and must not be to such an extent or in such a way as to impair professional independence and judgement of those involved.

By observing the following rules, employees can protect themselves from misunderstandings:

Code of Conduct of the LEHVOSS Group

(As of 31.3.2026)

- No objections to hospitality and meal invitations directly related to business to a reasonable extent (maximum of EUR 150 per person as a guideline).
- No objections to promotional items.
- In principle, there are no objections to gifts with a market value of up to EUR 40 (benchmark) - unless in a timely manner prior to the conclusion of contracts or negotiations, - to the private address or in any other non-transparent manner.
- Never cash or money substitutes, e.g. cheques, gift vouchers.
- Invitations for representation purposes or with a predominant or partial entertainment part only, - after special examination of customary business practice and appropriateness, - if representatives of the host are present, - participation is not repeated frequently, and - the travel and accommodation costs are not covered by the inviting business partner.
- In case of doubt, the Legal Department should be consulted

Particular caution is required in the case of public officials. Here, the rules for gifts and invitations of the respective authorities must be observed.

12. Donations and Sponsorship

The management decides on donations and sponsoring. They may not be used to indirectly obtain unfair advantages from business partners.

13. No Tolerance of Corruption, Special Caution with Public Officials

Our success in the market is based on performance, flexibility and service and must not be cheated by unfair benefits. Our business partners trust in the professional judgement of our employees.

The LEHVOSS Group therefore does not tolerate any form of bribery or venality, acceptance of benefits or granting of advantages.

Those who do not observe the rules on gifts and invitations in Clause 11 run the risk of becoming liable to prosecution for corruption offences. Even the promise or demand of unfair advantages can be punishable.

In the case of invitations and benefits to public officials, their internal rules for gifts and invitations must be observed in any case. The granting of advantages to public officials may be punishable as acceptance or granting of an advantage simply because it is made in view of the official position. It is not necessary that the exercise of office is to be influenced in an unfair manner. Anyone entrusted with the performance of public duties can be a public official, not only civil servants and public employees.

14. Prevention of Money Laundering and Terrorist Financing

The LEHVOSS Group has established risk-appropriate precautionary measures in accordance with the legal provisions and requirements of the regulatory authorities to prevent money laundering and the financing of international terrorism as well as export control. These must be observed at all times.

15. Protection of Competition

The LEHVOSS Group does not engage in any illegal agreements or practices that restrict competition, in particular price-fixing, market-sharing or any other coordination with competitors. Before deviating from

Code of Conduct of the LEHVOSS Group

(As of 31.3.2026)

standard contracts or procedures defined in cooperation agreements, employees must consult the Legal Department to ensure that no inadmissible effects under competition law arise.

In any contacts with competitors or business partners, employees must not disclose internal or confidential information - such as prices, terms, costs, market data, internal processes or other sensitive business information- without prior approval from the Legal Department.

16. Protection of LEHVOSS Group Assets and Protection of Natural Resources

Technical trade secrets and commercial business secrets are important LEHVOSS Group resources. Every employee is therefore obliged to protect them. This includes strict compliance with the LEHVOSS Group's information security regulations.

The assets and business equipment, business documents and working materials of the LEHVOSS Group may neither be misused for private purposes nor handed over to third parties if this could impair the interests of the LEHVOSS Group.

Employees shall minimise environmental impacts by using resources efficiently, reducing waste, promoting recycling and considering environmental criteria when selecting suppliers, materials and services. Environmental and sustainability considerations must be integrated into all relevant business decisions. This also includes adherence to defined sustainability criteria within the procurement process. Employees must use the applicable guidelines, tools and approval processes to ensure that environmental and social risks are evaluated and that procurement decisions support the Group's sustainability objectives.

17. Occupational Safety

Processes, operating sites and resources must comply with the applicable legal and internal requirements for occupational safety as well as health, fire and environmental protection.

18. Whistleblower

All staff are strongly encouraged to approach the Legal Department or their supervisor if they notice that someone is not behaving according to the rules. This can prevent small problems from becoming big ones. No employee who makes a report in good faith needs to fear any disadvantage or retaliation- even if the report turns out to be unfounded.

Our whistleblower system complies with international standards and ensures confidentiality, data protection and comprehensive protection against retaliation. Reports may be submitted in any language and by employees, suppliers or other affected parties. All incoming reports are reviewed by trained experts, and necessary investigations are carried out independently.

Possible compliance violations or human rights abuses can be reported by employees, business partners or affected persons via our anonymous whistleblower channel, accessible via link or QR-code:

<https://www.lehvoss.de/en/company/anonymous-whistleblower-channel/>:



Code of Conduct of the LEHVOSS Group

(As of 31.3.2026)

19. Consequences in the Event of Infringements

Violations of these rules can result in significant reputational damage and legal disadvantages for the employees concerned, their colleagues and the LEHVOSS Group, up to and including fines, criminal proceedings or restrictions on official permits. Furthermore, violations can lead to measures under labour law by the LEHVOSS Group.

Signature Management Board of the LEHVOSS Group
(Knut Breede, Dr Thomas Oehmichen, Soenke Thomsen)

Code of Conduct of the LEHVOSS Group

(As of 31.3.2026)

ANNEX: THE TEN PRINCIPLES OF THE UN GLOBAL COMPACT

The Ten Principles of the United Nations Global Compact are derived from:

- the [Universal Declaration of Human Rights](#),
- the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#),
- the [Rio Declaration on Environment and Development](#), and -
- the [United Nations Convention Against Corruption](#).

Human Rights

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2:

Businesses should make sure that they are not complicit in human rights abuses.

Labour

Principle 3:

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4:

Businesses should uphold the elimination of all forms of forced and compulsory labour; [Principle](#)

5:

Businesses should uphold the effective abolition of child labour; and [Principle](#)

6:

Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7:

Businesses should support a precautionary approach to environmental challenges; [Principle](#)

8:

Businesses should undertake initiatives to promote greater environmental responsibility; and [Principle](#)

9:

Businesses should encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10:

Businesses should work against corruption in all its forms, including extortion and bribery.