



IKA Group
Company Policy and Code of Conduct



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Table of contents

Preamble	2
1. Responsible and Lawful Conduct	3
2. Integrity and Mutual Respect	4
3. Responsibility, Management & Leadership	5
4. Human Rights	6
5. Environment and Technical Safety	7
6. Safety at Work	8
7. Fair Competition and Antitrust Law	9
8. Anti-Corruption	10
9. Fraudulent Actions (Fraud)	11
10. Compliance with Money Laundering Regulations	12
11. Export Control	13
12. Cooperation with Suppliers	14
13. Conflicts of Interest	15
14. Protection of Finances and Assets	16
15. Information Management, Data Protection	17
16. Implementation, Control, Sanctions	18

Preamble

This Code of Conduct is intended to be the basis and standard for all of our business activities and applies to all Employees of IKA Group and our business partners and reflects our corporate policy.

As an international Company, we are active in numerous countries. Our Employees and business partners make up an essential part of our corporate success. This allows us to guarantee quality, reliability and a high standard.

It is important to us that we only work with business partners who adhere to the same principles as we do, in order to be able to ensure a complete guarantee of ethics, morals and legal provisions.

This Code of Conduct sets out clear standards and principles on ethics and morals in business and applies to all our Employees, regardless of where they work. Likewise, we expect all of our business partners to adhere to the principles of ethics and morals.

Each individual Employee is responsible for compliance with and implementation of the Code of Conduct. This allows us all to carry out our work according to the needs of the Company and society in general.

Please also familiarize yourself with the corresponding Internal Company Guidelines. If you have any doubts about how you should or should act in a particular situation, do not hesitate to ask your Supervisor, the Managers, the Human Resources Department or the Legal Department. Employees also have a responsibility to notify their Supervisor and/or the Management, the Human Resources Department or the Legal Department if they are aware of any activity that conflicts with our policies.

By acting according to the rules of the Code of Conduct, we ensure that we are a Company that our Employees are proud of and that our customers, business partners and other stakeholders respect.

Thank you for your commitment

the Management

A handwritten signature in blue ink, appearing to read 'Thubw', is positioned below the text 'the Management'.

For all designations that refer to people, the wording chosen means all genders, even if only one form is given for reasons of easier readability.

1. Responsible and Lawful Conduct

Our Company is based on compliance with all international laws, the respective national laws and legal systems of the countries in which we operate. All our Employees comply with the legal provisions and regulations and act according to them. Violations of laws must be avoided at all costs. In addition, our Employees must observe the applicable internal guidelines.

The image of our Company is essentially determined by our actions and our appearance towards our customers and other business partners.

Impermissible or inappropriate behavior by even a single Employee can cause considerable damage to the Company and must be avoided at all costs.

That is why every one of our Employees should maintain and strengthen the good reputation of the Company when carrying out their work.

Any Employee who commits a violation will face disciplinary action, regardless of the sanctions provided by law.

Making a profit should never be used as a justification for not complying with the law or internal policies. We stand for partnership, sustainability, quality, respect, reliability, modernity, innovative spirit and solidarity.



2. Integrity and Mutual Respect

Protecting the personal dignity, privacy and personal rights of each individual is considered an essential principle in our Company. We promote equal opportunities. Our Company should be an environment characterized by fair behavior and free from harassment of any kind.

We work daily with people from different ethnic, cultural and religious backgrounds, with different age groups and genders. We do not tolerate harassment, offensive behavior or bullying of any kind.

These principles apply to our internal teamwork as well as to any cooperation with our external partners. Our decisions to work together - regardless of whether it concerns Employees, suppliers, customers or business partners - are based exclusively on professional considerations.

We are honest and open and stand by our responsibility. We are a reliable partner and encourage our Employees to deal fairly with customers, suppliers, competitors, business partners and colleagues.



3. Responsibility, Management & Leadership

Compliance starts at the top of every company. The Management and the Supervisors have to set an example for the Employees in the implementation of the content of the Code of Conduct.

All Managers have to comply with rules in day-to-day business and take responsibility for the Management of their Employees.

Every Supervisor in the Company should serve as a role model through exemplary personal behavior as well as through performance, openness and social skills.

However, this responsibility of the Managers does not relieve individual Employees of their responsibilities. Our principle is and remains that laws and Company guidelines must always be observed by every Employee.

Cooperation between Managers, Employees and colleagues is essential and contributes significantly to the success of the Company. Mutual respect and openness ensure good communication and the quality of our corporate culture.



4. Human Rights

Based on the UN Charter and the European Convention on Human Rights, human rights are considered fundamental values that must be respected and observed by all Employees.

We will never base our decisions, actions, or recommendations on issues of gender, race, creed, color, age, political opinion, or any other area of potential discrimination.

- We do not tolerate any form of forced labor.
- No children under the age of 15 are employed in our Company.
- Especially young people under the age of 18 must not do any work that endangers their health, safety or morals.
- Employing a minor should never be at the expense of their education, development or general well-being.
- We consider employment to be freely chosen and free from threats.



5. Environment and Technical Safety

It is important for our Company to protect the environment and conserve natural resources. The environmentally friendly performance of our daily work is lived through corresponding activities of the Management and our Employees, which means that continuously improved standards are achieved

The safety of our Employees, product safety and the technical safety of our products are just as important to us as the achievement of economic goals. Fulfilling customer requirements with regard to the quality and environmental compatibility of our products is very important to us. We strive to work according to the current state of the art, which also includes the continuous process of technical development.

For us, environmental protection and technical safety means fully complying with all laws and regulations.

In order to achieve our goals, we have introduced an integrated quality and environmental management system in accordance with the requirements of DIN EN ISO 9001:2015 and DIN EN ISO 14001:2015. Learning from mistakes, immediate measures in the event of deviations, targeted cause analysis, action tracking and high quality assurance standards in the respective core processes lead to fewer internal errors and fewer customer complaints. This also includes the qualification and development of important partners and suppliers.

Our goal is also the constant improvement of environmental protection in all phases of product life, from product development through the purchase of raw materials to product manufacture. High standards of organization and the process environment form the basis for the smooth functioning of a company in general. The organization and working methods encourage employees to take responsibility themselves and to develop their creativity and skills, both individually and in teams.

We feel committed to the integrated approach of our QUM system and align our innovative work accordingly. Our integrated management system strengthens understanding and ensures the stability of our processes over the long term. Through continuous improvement of processes, infrastructure and process optimization, we create the conditions to optimally meet the expectations and requirements of our customers.

Our Company has been actively involved in the voluntary commitment of VinylPlus® and ESPA and maintains an active membership in them. VinylPlus® aims to advance the use of the PVC life cycle, promote science-based solutions for the safe and sustainable use of additives, support innovative recycling technologies and prioritize the PVC life cycle through eco-design. Emissions and the ecological footprint are to be reduced. Accordingly, our goal is to ensure that all ingredients used in our products are sourced responsibly and in accordance with VinylPlus® Supplier Certificate (VSC) guidelines.

In our Company it is important to use energy efficiently, to minimize the emission of greenhouse gases, to reduce the consumption of fossil fuels and to increase the use of renewable energy sources. Raw materials and materials should be used in an appropriate and sustainable manner. Water should be used sparingly and efficiently. At the same time, measures are taken to ensure that the drinking water is not disturbed by contamination.

6. Safety at Work

An important corporate goal is safety at work and protecting the health of Employees.

In order to fulfill this responsibility, the following principles regarding the content of the Company policy have been declared:

- Efficiency and security of operational activities are equally important goals.
- In relevant or dangerous situations, the protection of Employees always has priority.
- The causes of every accident at work are carefully investigated and necessary measures are taken to prevent similar incidents.
- Employees' awareness of safety at work is primarily increased by:
 - Diligence and conscientiousness in self-responsible activities,
 - exemplary behavior,
 - Information, training and appropriate controls to ensure existing and future safety standards and
 - contribution of personal experiences to improve existing security standards.
- Compliance with all safety and hygiene regulations.



7. Fair Competition and Antitrust Law

We expressly declare that we comply with all relevant antitrust laws and regulations. Every Employee is obliged to comply with the rules of free competition and to avoid violations of antitrust law at all costs. We treat all our business partners fairly and convince through performance and quality.

These include e.g. agreements or understandings with competitors to prevent, restrict or distort competition; in particular about pricing, products, customers, suppliers, contractual partners, markets, sales areas, investments, corporate strategy, calculations, production, marketing, contractual provisions and the disclosure of other Company-related information.

We expect our business partners to also comply with antitrust and competition laws.



8. Anti-Corruption

Our relationships with suppliers, customers and other business partners are based on fair conduct and our business decisions are based on a solid and professional foundation.

All employees are strictly prohibited from offering or accepting benefits, either directly or indirectly, if it could intend to improperly influence business transactions or if it could even give the impression of doing so.

This does not apply to gifts and invitations if they are of low value and can be considered appropriate business practice for the region concerned.

The acceptance of entertainment must always be business-related and never give the appearance of influencing.

A gift that does not meet the established principles must be refused or returned. In addition, the Supervisor/Management must be informed. If a valuable gift cannot be refused for legitimate business purposes or local custom, the Employee may accept the gift but must immediately report and return it to his or her Manager.

These rules apply equally to gifts and invitations that our Employees offer to third parties.

Exceptions are only possible with the prior consent of the Supervisor/Management.

9. Fraudulent Actions (Fraud)

Fraud is a property crime in which the perpetrator, with the intention of unlawful enrichment, deliberately deceives the victim by using pretenses or suppression of facts in such a way that he damages his own property or that of a third party and thus causes material damage.

Fraud includes any misappropriation of funds or assets, theft, any form of corruption including bribery payments, balance sheet manipulation and also intentional concealment of violations of the law and/or internal regulations.

There is no minimum monetary threshold for a fraudulent act.

Our Company has a zero-tolerance policy on fraud and proactively fights fraud to identify and prevent fraud risks in our business activities.



10. Compliance with Money Laundering Regulations

Money laundering refers to the process of smuggling illegally earned money or illegally acquired assets into the legal financial and economic circuit. Since the money to be "laundered" comes from illegal activities such as corruption, bribery, robbery, extortion, drug trafficking, arms trading or tax evasion, its origin should be concealed.

We do not support any money laundering activities in any way. We only maintain business relationships with reputable business partners whose activities comply with legal regulations and whose financial resources have a legitimate origin.

We work exclusively according to the principle "Know your customer".

All Employees must comply with applicable money laundering laws. Suspicious customers, means of payment and transactions that raise even the slightest suspicion of money laundering must be reported immediately to the responsible Supervisor/Management, who will then take any further necessary steps.

Compliance with money laundering regulations can only be guaranteed and suspicious behavior can only be detected through the constant attention and cooperation of our Employees.

11. Export Control

We comply with all regulations of the customs laws as well as all provisions relating to foreign trade, in particular sanction restrictions. Violations of export controls can result in significant penalties.

Export controls relate to importing or exporting to or from sanctioned countries, personal sanctions, financial sanctions and sectoral sanctions.

All workers involved in the export and import of goods must comply with applicable sanctions, export and import regulations.



12. Cooperation with Suppliers

IKA is committed to fair behavior towards suppliers. We expect our suppliers to share our values and comply with all applicable regulations. In addition, they are expected to work under similar principles of ethical and legal responsibility.

These principles are as follows:

- Compliance with all applicable laws
- Prohibition of any kind of corruption
- Compliance with human rights
- Prohibition of child labor and forced labor
- Prohibition of discrimination
- Fair trade
- Responsibility for the health and safety of employees
- Compliance with national and international data protection laws and the protection of personal data
- Confidential use of the business partner's secret information
- Compliance with environmental standards
- Sustainable use of raw materials and ensuring a sustainable supply chain



13. Conflicts of Interest

Every Employee and other Representative of our Company should protect the interests of the Company and not place themselves in situations where personal, family and/or financial interests may conflict with our interests.

Aside from smaller non-controlling interests in publicly traded companies, potential conflicts of interest can arise especially when an Employee (or a family member) has a financial interest in the business success of competitors, existing or potential suppliers and other business partners of ours.

Conflicts of interest also arise when an Employee uses or shares confidential information that becomes available to them through their employment with us.

If an Employee has a conflict of interest of any kind, it must be reported to their Supervisor/the Management in order to find a solution that conforms to the rules.

The Employee must not participate in a business decision or in the preparation of a business decision if there is a conflict of interest.

14. Protection of Finances and Assets

We must comply with accounting and accounting regulations, local laws and all applicable international rules and regulations designed to protect financial assets.

All our Employees act within the scope of their authority and document and archive the necessary documents and accounts for audit and financial reports.

Exceptions are only permitted in the case of immediate measures to protect life and property.

All Employees have a duty to take care of Company property and assets and ensure that they are not damaged, misused or wasted.

15. Information Management, Data Protection

IKA follows applicable data protection laws and protects personal data of Employees and business partners. No personal data may be processed and/or disclosed, except in accordance with applicable legislation.

All Employees must document, securely store and archive the information relevant to the Company so that all business transactions are properly recorded and traceable.

Business secrets and sensitive information from us and from our business partners are to be treated confidentially. The unauthorized transfer of technical know-how, Company and business secrets from IKA or third parties is strictly prohibited for all Employees.

All Employees must be careful not to damage the reputation of our company, especially when communicating in writing (including on social media).

All written communications must be consistent with the Code of Conduct and reflect its values.

The Management is solely responsible for external communication with third parties such as the media.



16. Implementation, Control, Sanctions

The fulfillment of and compliance with the rules defined in this Code of Conduct are an important statement of our organization and Company philosophy. In addition, the Management is aware of its responsibility and will actively ensure compliance with the Code of Conduct. This also includes setting a good example in compliance issues and regularly communicating the importance of this Code of Conduct to the respective Employees.

The Code of Conduct comes into force on the date of signature by the Management. All Managers/Supervisors are obliged to ensure that their Employees are informed about the content and meaning of this Code of Conduct, understand it and follow it.

In the event of ambiguities, questions or suggestions, Employees can speak to the Management, their Supervisor, the Human Resources Department or the Legal Department at any time.

In the event of suspicion of violations of the law or non-compliance with this Code of Conduct, each Employee must contact the Management.

Violating the provisions of this Code of Conduct will result in consequences under labor law; serious violations may also result in criminal and/or civil consequences (liability).

If a business partner violates the provisions of this Code of Conduct, we reserve the right to terminate the business relationship.