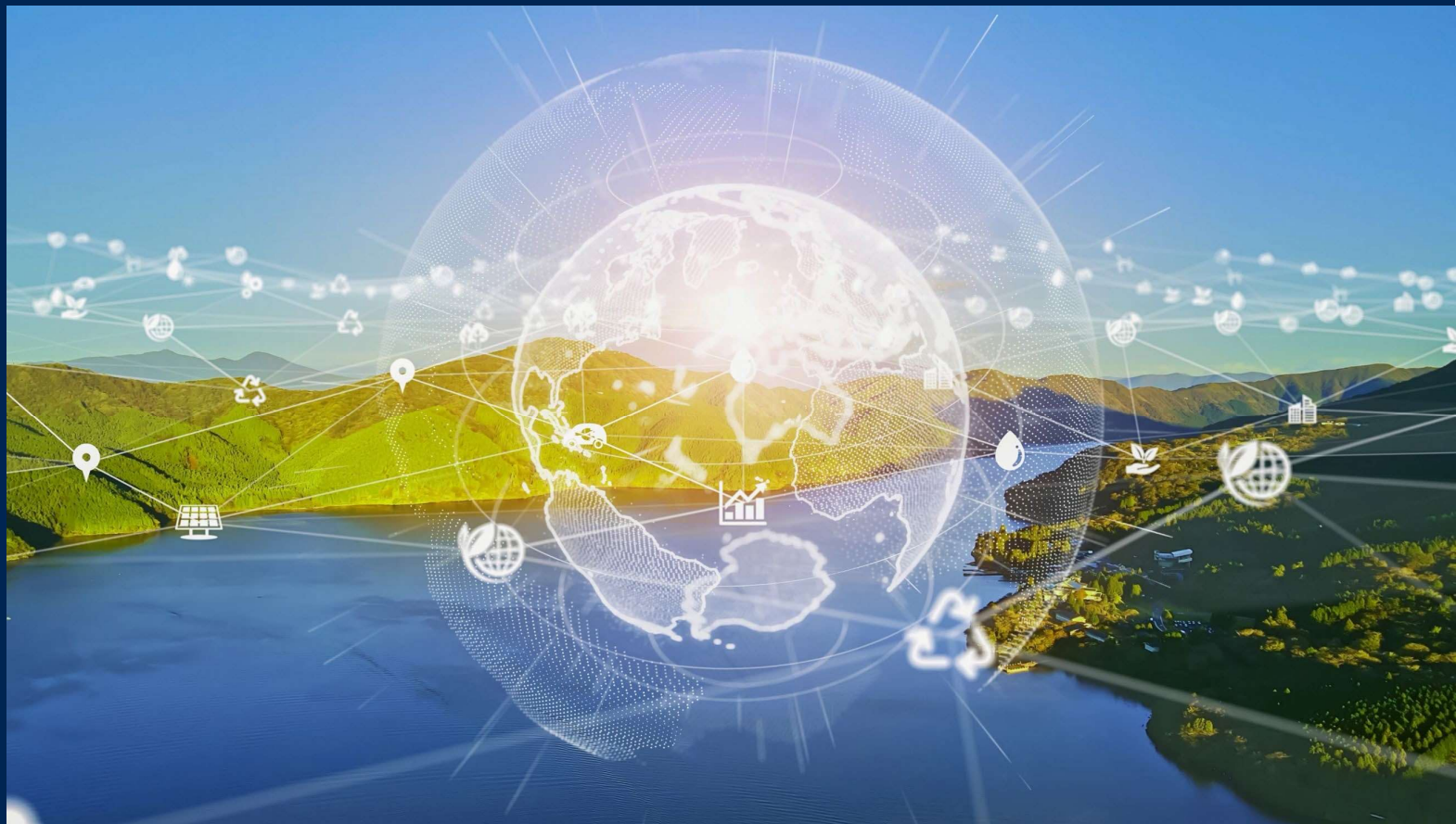


# Our Code of Conduct

(Verhaltenskodex)



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Dear Colleagues,

The trust that our customers and the public place in ALBA is our greatest asset. It is a trust that we have earned over the years, but we also have to earn this trust again each and every day. Only if we all act sincerely and responsibly can we protect and consolidate this respect over the long term. This is how we lay the foundations for our continued business success and the safeguarding of our jobs.

The basis of our actions is provided by our Code of Conduct (Verhaltenskodex). As a shared guideline, it designates the minimum standards both regarding the way in which we relate to each other at ALBA, as well as with business partners and the public. In this respect, the Code of Conduct follows a simple and fundamental principle: all of us – whether we are employees, managers or members of the Board of Directors – are required to act appropriately and properly in our daily work.

This includes, first and foremost, knowing the legal and ethical requirements, and complying with them. Violations of these are not only incompatible with our values, but they also damage our reputation as a company – and thus all of us. Moreover, they can have serious legal consequences. This is where the Code of Conduct provides guidance.

It is binding for all of us. However, its objective extends far beyond being a list of instructions. The Code of Conduct conveys the values to which ALBA is explicitly committed. And: It also encourages us to use our own powers of judgement and to seek advice when needed.

We want to work together on the basis of respect, cooperation and teamwork. By placing our Code of Conduct at the heart of everything we do, we encourage a culture of ethically responsible behaviour. This also includes an atmosphere of openness that enables us to address issues without fear of reprisals. This applies to infringements of the Code of Conduct in particular. Anyone who discovers an infringement of this kind can always turn to the Compliance Department.

Ensuring the success of ALBA over the long term is a task that we are all working on. By making the right decisions in your daily work, you can make a significant contribution to this.

On this note, thank you very much for all of your efforts.



Dr Eric Schweitzer

CEO ALBA Group & ALBA Europe Holding



## Our values.



[www.alba.info](http://www.alba.info)

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ALBA

ennen es Rohstoff



B CT 6107

# Our collaboration.

## **We focus on respect.**

At ALBA, we respect, protect and promote the human rights enshrined in the United Nations Human Rights Covenants and guarantee the free personal development. Our cooperation is guided by mutual respect. In detail, this means:

### **Our actions are characterised by tolerance.**

We do not tolerate discrimination of any kind – neither because of ancestry, gender, age, culture, ethnic, social or national origin, nor because of religious affiliation, faith or belief, sexual orientation, gender identity, disability or other personal characteristics. Diversity enriches our lives and work. Our culture is characterised by equal opportunities, trust and mutual respect. Colleagues in management positions set the best example here.

### **We respect the right to freedom of association and the right to organise.**

We respect the right of all employees to freedom of association, freedom of organisation and collective bargaining within the framework of national laws and act accordingly. ALBA does not interfere with the exercise of this right in any way.

### **We compensate employees appropriately.**

The pay at ALBA is at least the applicable minimum wage. We pay wages on time, regularly and in full.

### **We document the terms and conditions of the employment contract.**

Each employee receives the conditions of the cooperation, including working hours and remuneration, in the form of an employment contract and other documents before the employment relationship begins.

### **We are committed to the abolition of child labour.**

The protection of minors is particularly close to our hearts. We do not employ children below the age of 15 or before they reach the age at which compulsory schooling ends, unless the applicable national law provides for exceptions.

Children and adolescents may also not be employed in activities which, by their nature, are likely to harm their health, safety, development or morals. This includes, for example, activities at dangerous heights, with dangerous machines or substances, or under particularly difficult conditions such as night work or work that conflicts with school education.

**We do not tolerate forced labour.**

No employee is forced to work by violence or intimidation of any kind. We prohibit any involuntary employment, any form of modern slavery, forced or bonded labour. This includes any work or service that is required of a person under threat of punishment and for which they have not volunteered.

Degrading treatment, corporal punishment as well as deductions from wages as disciplinary measures are not permitted.

**Other human rights from the human rights covenants.**

We also respect all other human rights contained in the United Nations human rights covenants. Other important rights in this context include the right to maternity protection and paid maternity leave, and the rights to life, to health, to freedom of expression and to freedom of association.

**For each and every one of us, this means that we ...**

- address suspected violations of human rights,
- do not accept jokes or remarks of a discriminatory nature,
- act and interact with each other with respect for human rights and tolerance.

**We protect the environment – and each other.**

Our daily work focuses on environmental protection and sustainability, as well as the safety and health of all our colleagues. In detail, this means:

We base our actions on environmental protection. Together, we develop innovative solutions to conserve natural resources and promote sustainable development. We also align our business processes with sustainability. We recycle raw materials and each individual makes a point of preventing waste and contributing to environmental protection. In the event of harmful emissions and contamination of



air, water and soil, we comply with all relevant thresholds, just as we do for noise emissions and water consumption. We implement these in accordance with local laws.

We monitor, control and label our hazardous materials, chemicals and substances and ensure their safe handling, movement, storage, re-use and disposal. We strictly comply with applicable laws and regulations regarding hazardous materials, chemicals and substances. We comply with the prohibitions and requirements of the Minamata Convention<sup>1</sup> and the Stockholm Convention<sup>2</sup>.

In addition, we also observe the requirements of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

**We pay attention to safety and support the health of all employees.**

Safety and occupational health have top priority for us.

We are also committed to maintaining and promoting the health of our employees and make an active contribution to this with our offers within the framework of company health management.

We take measures to avoid excessive physical and mental exhaustion of our employees, for example through working time management and sufficient rest periods.

Every individual is trained in the applicable safety regulations in the areas of health, safety and emergencies in the workplace, such as building safety and fire protection. We protect all employees when using hazardous substances and carrying out hazardous activities.

We regularly assess hazards and potential health risks, take the necessary protective measures and document both in a risk assessment.

Colleagues in management positions are happy to provide information and support in complying with the regulations.

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<sup>1</sup> Convention on the control of emissions and releases of mercury

<sup>2</sup> Convention on the Prohibition and Restriction of Long-Lived Organic Pollutants

We also plan and operate our facilities in strict compliance with the safety regulations. In this way, we reduce the risk of accidents and ensure trouble-free operations.

The same high standards also apply to our subcontractors. Further information can be found in our Supplier Code of Conduct.

**For each and every one of us, this means that we ...**

- follow the rules and procedures on environmental protection and occupational health and safety,
- always carry out tasks in a safe way and ask questions if we are unsure,
- obtain the necessary environmental permits.



**ALBA**   
Wir sind die Zukunft.



Nicht in die  
Schüttung greifen

# Our business activities.

## **We avoid conflicts of interest.**

We always make business decisions in the best interests of our company. Under certain circumstances, however, it is possible that conflicts of interest may arise. At this point, caution is required. After all, personal interests or relationships must not play a role in business decisions. The best approach is to avoid such conflicts of interest at the outset. If this is not possible in individual cases, we discuss them openly with our superiors.

Voluntary work we do in our free time, although generally welcome, can also be associated with conflicts of interest. The same applies to secondary occupations, work on supervisory boards and advisory boards or financial investments. Before entering into an activity of this kind, an assessment is necessary together with the superior.

### **When can conflicts of interest arise, for example?**

- Staffing decisions
- Business relationships with third parties
- Private contracting of suppliers or other business partners
- Taking up secondary employment

## **We take social responsibility.**

We recognise our charitable and social responsibility as a corporate group. We therefore make regular donations to charitable, cultural or scientific causes. These are voluntary contributions in cash or in kind which we identify as such and make in the interests of our corporate group. ALBA only participates in sponsorship activities, which in contrast to donations, is rather transactional in nature, in exceptional cases.

We support the efforts of colleagues who engage in voluntary work or who are politically active. However, we never engage in such activities in the name of ALBA.

## **We do not tolerate corruption.**

The legality of our business practices takes precedence over our economic success. In competition, we distinguish ourselves through quality and service – we do not tolerate corruption.

Corruption is the unlawful influencing of business partners by granting or accepting advantages that go beyond the legal regulations or our own internal company rules, for example in the context of customer care. Corruption not only prevents fair competition and causes economic damage, it also damages our good reputation. In many cases, corruption is also a criminal offence. We protect ourselves and our business partners by dealing transparently with donations of all kinds.

**For each and every one of us, this means that we ...**

- act ethically, with integrity and transparency,
- do not accept or make any improper monetary gifts,
- report suspected cases of bribery as well as actual infringements,
- only choose our business partners according to objective criteria.

**We fight money laundering.**

Money laundering occurs when funds or other assets originating directly or indirectly from criminal offences are brought into the lawful economic cycle and their origin is thereby concealed.

At ALBA, we are committed to strict compliance with the applicable anti-money laundering laws. We apply measures to verify the identity and reliability of our business partners and to avert risks at an early stage. We also ensure that all business transactions are fully and properly reflected in our invoicing and accounting system. If we observe irregularities, we ensure that they are reviewed by the relevant finance, legal or compliance department.

**We engage in fair competition.**

We are committed to fair and legal competition according to the applicable competition and antitrust laws. Anti-competitive behaviour, such as price and territorial agreements between companies, lead to a distortion of competition. Unfair methods of competition also regularly lead to legal disputes and can result in significant contractual penalties, regulatory fines and civil liability claims.

**The most important taboos at a glance:**

- Collusion on prices, market shares, capacities or other commercially sensitive information
- Division of regional markets or customers
- Price fixing
- Abuse of market power



# Our management of information and property.

## **We handle insider information confidentially.**

During our work, we sometimes come across information that could influence the stock market price of the ALBA SE share if it became known. This knowledge is referred to as “insider information”. Its disclosure, or trading based on insider information, is illegal.

At ALBA, we protect our trade and business secrets and handle insider information relevant to the stock market in a trustworthy and responsible manner in accordance with applicable laws and regulations. We only use knowledge of insider-relevant processes internally and do not pass it on to outsiders, including family members.

## **We protect intellectual property,**

Innovations are of great importance for the commercial success of a company. The rights to tangible and intangible assets such as trademarks, designs, copyrights or know-how are therefore under special protection.

We fully recognise the intellectual property of others and ensure that no one gains unauthorised access. No form of use, reproduction or distribution is permitted without the consent of the copyright holder(s). Should we gain access to sensitive information or information of third parties that requires protection, we undertake to maintain confidentiality. We also carefully protect our proprietary company know-how.

## **... sensitive data ...**

The protection of personal data of our business partners, customers and colleagues is very important to us.

For us, data protection is the basis for a reliable business relationship and a component of a trusting working relationship. We therefore comply with the relevant data protection regulations and implement them in our business processes.

We process all personal data confidentially. To this end, we take suitable technical and organisational measures in accordance with the current state of the art. We also regularly check compliance with the requirements of data protection law and

constantly adapt our data protection organisation to the changing legal requirements and demands of our business partners and colleagues.

### **... and corporate property.**

We use the tangible and intangible property of the corporate group exclusively for company and not for personal purposes.

#### **For each and every one of us, this means that we ...**

- never disclose confidential information,
- handle personal data with care,
- do not use work computers or the internet for private purposes.

### **We cooperate with public authorities and municipalities.**

We are cooperative and transparent in our dealings with public authorities and municipalities. We provide information in a complete, punctual, open, accurate and understandable manner. In advance, we inform at the internal level and involve our legal department when infringements of applicable law are investigated.

### **We report on a transparent and reliable basis.**

Only through proper accounting and correct financial reporting is ALBA able to create and maintain public confidence.

We therefore prepare our accounting and financial reporting in a correct, punctual, complete and transparent way in accordance with the respective legal regulations and standards.

We act in accordance with applicable tax laws and regulations. This applies to both the tax declaration and the tax reporting in our financial statements.

#### **For each and every one of us, this means that we ...**

- design our processes in such a way that all business financial data can be recorded correctly and in a timely manner in the accounting system,
- comply with legal requirements and tax laws and regulations.

### **We report infringements.**

Integrity and honesty are core components of our corporate culture. They allow us to deal with problems openly and transparently.



However, if infringements of laws, policies or this Code of Conduct occur, each of us is required to report them. For this purpose, our Compliance Department is at your disposal at [compliance@alba.info](mailto:compliance@alba.info) as well as our whistleblower portal on our homepage, which offers a completely anonymised procedure upon request. The reporting and reported persons, as well as the respective facts, are treated strictly confidentially at all times.

### **We protect whistleblowers.**

We guarantee the greatest possible protection to persons who help to encourage proper behaviour at ALBA. Any pressure on whistleblowers – in the form of discrimination or other reprisals, for example – will not be tolerated. This applies regardless of the consequences resulting from the report or whether reported facts turn out to be untrue. If the reporting person is themselves involved in the offence, the self-disclosure can be positively taken into account. The investigations will be conducted with the utmost confidentiality.

### **No disadvantages may arise from reports made in good faith.**

Reports made out of malice which are defamatory or clearly false, for example, constitute an abuse of the reporting procedure. These are punishable with disciplinary measures or may be prosecuted under criminal law.

### **For each and every one of us, this means that we ...**

- familiarise ourselves with the Code of Conduct,
- act in good faith,
- report misconduct immediately.

## **Legal notice**

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