

A photograph of a modern office interior with large windows. Several people are working at desks, some looking at laptops and others at documents. The scene is brightly lit, suggesting a sunny day. The office has a clean, professional look with white desks and chairs.

**BUSINESS CODE OF
CONDUCT GUIDELINE**
PULCRA GROUP

Pulcra Chemicals
The solution specialist

Dear Colleagues,

Pulcra's vision is to be recognized by our customers and employees as a world class chemical solution provider and a globally acting diverse specialty chemicals company.

We adhere to the highest standards in our industry. In order to achieve our goal, Pulcra is strictly committed to safety, environmental and legal compliance with all regulations and quality programs.

Pulcra's **Business Code of Conduct** has been established in order to provide you with additional guidance on dealing with compliance related matters and to prescribe main rules of business conduct both internally and when you are interacting with external business partners and third parties.

Sustainable business growth can be ensured if every employee takes personal responsibility and complies with our high standards for code of conduct principles.

I invite you to pro-actively embrace this responsibility, educate yourself about code of conduct principles and no matter what, always feel comfortable to report cases of compliance violations.

Thank you for your commitment.



Bernd Schalk, CEO

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1. Scope

Pulcra Group Business Code of Conduct Guideline is binding for all employees of the Pulcra Group worldwide.

2. Basic Standards of Conduct

2.1. Compliance with Law and Business Ethics

Pulcra Group is committed to the highest ethical business standards and compliance with all applicable laws and regulations in conducting its business. Each Pulcra employee is required to comply with these conduct rules.

2.2. Pulcra Image

Inappropriate behaviour on the part of any individual employee may cause significant harm to the image of Pulcra and to the trademarks. Thus, in the performance of his/her duties and behaviour, every employee is required to protect the reputation of the company in the eyes of the public. Every employee has to act responsibly.



2.3. Employment

Respect for each other forms the basis of Pulcra's culture. Pulcra respects the personal dignity, privacy and personal rights of every individual.

We are fostering an open and trustworthy work environment where individual contribution is valued. We work with people without regard to national origin, age, gender, sexual identity, skin color, culture, religion or disability.

Each employee must strive to ensure that the work environment is respectful and free from abusive behavior and sexual harassment.

Every manager is responsible for ensuring compliance with the Business Code of Conduct guidelines, in particular but not limited to, within his/her area of responsibility with proper supervision and communication and also himself/herself by behaving with integrity and in compliance with the conduct guidelines.



3. Interaction with Business Partners and Third Parties

3.1. Anti-Corruption

No employee may offer, promise or grant any illegal gifts or benefits in the course of business dealings to public officials and other Pulcra business partners.

No employee shall demand and accept gifts and benefits directly or indirectly from a third party for anything of a significant value or on a frequent basis. It is not permitted to provide or receive gifts or entertainment with the intent to inappropriately influence or induce business.

This does not include accepting/granting customary occasional gifts of immaterial value or invitations to meals/events of a reasonable scope (here immaterial value will be defined by country Managing Directors) if they are otherwise lawful.

3.2. Fair Trading and Competition

Compliance with Antitrust or Competition Laws and regulations is a significant part of the general commitment to legal compliance.

No employee shall participate in arrangements or agreements with any competitor with regard to prices, terms and conditions of sales and service, production programs, distribution, market territories. Exchanging or discussing about prices, terms or conditions of sale or service, production capacity or any other competitive information with a competitor is not permitted.

3.3. International Trade

All employees involved in importing and exporting goods and services must be familiar with and comply with all of the relevant trade sanctions, Export control and Import laws and regulations applicable in the country in which business is conducted.

In addition all employees must strictly comply with the legal rules on combating money laundering. Suspicious conduct by customers, consultants or business partners must be reported. All of the applicable rules with respect to recording and accounting for cash and other transactions and contracts must be complied with.





4. Responsibility

4.1. Avoiding Conflicts of Interest

All Pulcra employees have to make their business decisions in the best interest of Pulcra, not on the basis of their own personal interests.

As soon as the circumstances of a conflict of interest arise, the employee has a duty to disclose and notify to his supervisor of each personal interest (including personal interests of family members or close personal friends) and the supervisor should disclose the conflict of interest to Fashion CEO.

4.2. Handling of Company Assets and Company Property

All employees are obliged to properly use and protect company assets and property. All employees have to use the funds of the Pulcra Group in a prudent, reasonable and responsible way. Unnecessary expenses always have to be avoided.

4.3. Confidentiality

Confidentiality must be observed with regard to all forms of company information which have not been made known to the public and use them only for business purposes. Such matters include, for example, information on the organization, companies business, manufacturing, research and development processes, trade secrets, technical information, business strategies ,company projects and internal reports.

4.4. Data Protection and Information Security

All Personal data collected for necessary and clearly defined legitimate purposes, will be processed in compliance with the locally applicable data privacy laws and securely stored with limited access given to only authorized employees and agents.

Confidential personal information may only be transmitted with proper authorization and if the required technical security measures are observed.





5. Safety, Health, Environment, Quality (SHEQ)

While supplying products and services of high quality, protection of the environment and the safety and health of Pulcra employees are the primary goals of Pulcra. Pulcra has to and will comply with all applicable laws, regulations and relevant industry standards of practice concerning the protection of the environment and the protection of the safety and health of its employees and third parties affected by its business activities or products.

All employees shall conduct their duties and responsibilities in a manner which is compatible with achieving these goals and carrying out this policy.



6. Reporting of Compliance Violations

Unethical behavior, violations of Pulcra code of conduct or law can damage reputation, harm the company or our stakeholders, and may even subject individuals or the company to fines and civil and/or criminal liability.

Employees should immediately bring matters of potential violations of Law and Business Conduct Guidelines to the attention of Compliance Committee which is composed of Group CEO, Group CFO, Global HR and Global Internal Audit.

You can report your concerns also via Pulcra compliance email address: Compliance@pulcrachem.com

The privacy of the persons involved will be protected except to the extent reasonable necessary to conduct a proper investigation or as required by law.

Like to find out more?

info@pulcrachem.com

www.pulcra-chemicals.com

Pulcra Chemicals Group

Isardamm 79-83

82538 Geretsried

Germany

Phone: +49 8171 628 0

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