



Code of Conduct for Suppliers

BARBE Group of Companies

Ethical values and sustainability guidelines

September 2023



The Barbe Group of companies (in the following BARBE) develops, produces and distributes high-quality processing aids for various industries. With industry-leading products, tailor-made solutions and excellent service, BARBE has been a reliable partner to companies worldwide for over 65 years.

BARBE recognizes its responsibility within its own organization, towards clients, customers and suppliers as well as towards the climate and society. BARBE activities are oriented by the values of integrity, fairness, and respect and comply with national and supranational legal regulations, as well as applicable international conventions, and prevents violations of the of the countries in which we operate. If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct.

BARBE therefore supports initiatives and principles such as the UN Universal Declaration of Human Rights, the principles of the UN Sustainable Development Goals (SDGs), the UN Global Compact (UNGC), the International Labor Organisation Principals (ILO), the OECD Guidelines for Multinational Enterprises, DIN ISO 9001 and DIN ISO 14001 and commits to anchoring these in its core business principles and procedures.

This Code of Conduct for Suppliers defines BARBE's requirements regarding general business principles and fair competition, working and social standards, climate protection and product safety, full compliance with which BARBE equally requires of its suppliers and service providers.

The Code of Conduct applies to all suppliers and service providers with whom BARBE Group has a direct business relationship ("Business Partner" or "business partners" in the following) including but not limited to suppliers of personnel leasing (staff supply, personnel service), employment agencies and logistics companies as well as their management, employees and subcontractors.

All business partners are expected to carefully read and sign this Code of Conduct and to act within the framework of these rules. Business partners undertake to demand compliance with the principles and rules of the Code of Conduct from their suppliers.

A prerequisite for a business partnership with BARBE is the confirmation, compliance and signing of this Code of Conduct or the submission of an own Code of Conduct which refers to the same principles.

BARBE reserves the right to update the Code of Conduct as necessary and expects its business partners to accept such changes.

BARBE does not tolerate violations of this Code of Conduct.

This Code of Conduct for Suppliers is based on the industry standard for sustainable value creation of the Sustainability Initiative of the German Chemical Industry (Chemie³), initiated by the German Chemical Industry Association (VCI), the Mining, Chemical and Energy Industrial Union (IGBCE) and the German Chemical Employers' Association (BAVC).

This English version of this Code of Conduct is not the original version but has been translated from the German version.



Responsible Business Practices

Compliance with Laws, Recognized Standards and Guidelines

Business Partner hereby commits to upholding all respectively applicable national laws in all its business actions and decisions, and also to upholding the relevant internationally recognized norms, directives and principles, in particular the Principles of United Nations Global Compact, the General Declaration of Human Rights, the Conventions of the United Nations Organization, the core labor standards of the International Labour Organization (ILO), and the OECD Guidelines for Multinational Enterprises. Furthermore, BARBE requires Business Partner to ensure it upholds its own company-internal guidelines and self-commitments.

Compliance with this Code of Conduct as well as currently applicable norms and standards shall not be voided by side-agreements such as divergent contractual agreements or any other comparable measures.

Prevention of Corruption

Business Partner hereby commits to upholding international and local anticorruption laws and standards. Business Partner shall not attempt, whether in Germany or abroad, to influence its own business partners in a sanctionable manner, for instance through offering, requesting or exchanging gifts, inducements (financial or otherwise), remunerations, benefits or compensations.

Working Standards

Occupational Health and Safety

A core business goal of BARBE is to prevent accidents in the workplace as well as work-related illnesses. Our constant objective is to ensure employees' wellbeing and satisfaction,

Antitrust and Competition Law

Business Partner hereby commits to upholding the corresponding national and international antitrust laws, as well as laws against unfair competition. Price or condition agreements with competitors are therefore also forbidden, or any other forms of competition-inhibitive agreements, in particular agreements with competitors with the covert objective of market-sharing or customer allocation.

Confidentiality and Data Protection

Business Partner hereby commits to upholding the stipulations of applicable data protection and data privacy laws. Personal data may thus only be gathered, processed or used insofar as it is essential for pre-established and legally permitted purposes. The use of such data must be transparent to the data subject (the person to whom the data refer); Business Partner commits to upholding all laws governing the notification and reporting of personal data as well as the withdrawal of consent to personal data usage, blocking and deletion.

Export and Import

Business Partner hereby commits to upholding currently applicable laws governing import and export, and in particular to abide by official sanctions, embargos and other relevant laws, regulations, state and national directives and policies governing the transfer, provision or delivery of goods and/or technology.

which at the same time contributes to the success of our business.

We therefore require Business Partner to ensure a safe, healthy and hygienic working environment, and to take the necessary measures to prevent all forms of work-related accidents



and health impacts. Within this effort, Business Partner commits to complying with internationally recognized occupational safety standards. Furthermore, Business Partner undertakes to drive the continual improvement of its working environment and to prioritize safety-related employee training.

Worktime

The worktime structures implemented by Business Partner shall comply with the respectively applicable national laws, industrial sector standards and relevant ILO conventions.

Wages and Social Benefits

Business Partner hereby guarantees that the wages it pays to its employees at least meet the

minimum legal wage as well as the minimum wage established for the industrial sector. Furthermore, Business Partner shall provide its employees with social benefits that correspond to the respectively applicable national or local standards.

Training and Qualification

Business Partner hereby commits to promoting and developing its employees' skills by means of suitable training and further education measures.

Complaints Mechanisms

Business Partner hereby commits to implementing and maintaining whistleblowing and complaints mechanisms for its employees.

People and Fundamental Rights

Human Rights

Business Partner hereby commits to upholding and supporting full compliance with human rights (see: United Nations Universal Declaration of Human Rights).

Approach to Child Labor

The exploitation of children and adolescents cannot be tolerated in any form. Business Partner hereby commits to upholding the Principles of the United Nations regarding human and children's rights, and in particular commits to upholding ILO Convention 138 on the Minimum Age for Admission to Employment, as well as ILO Convention 182 on the Worst Forms of Child Labour. Wherever national law governing child labor imposes stricter criteria, this law shall take priority.

Approach to Forced Labor

No form of forced and/or obligatory labor can be tolerated. This means that Business Partner shall not impose any form of involuntary

employment, or employment that involves the threat of punishment or other sanctions, including obligatory overtime, indentures, forced labor by prisoners, slavery or bonded labor. Furthermore, Business Partner hereby commits to taking action to eliminate forced and obligatory labor.

Freedom of Association and Collective Bargaining Rights

Business Partner hereby commits to upholding its employees' fundamental right to freedom of association, and their right to collective bargaining (negotiation) within the established framework of national laws, and to ensuring that these rights are not infringed.

Disciplinary Measures and Approach to Employees

BARBE requires Business Partner to treat its employees with dignity and respect. Sanctions, fines, other punishments or disciplinary measures may only be imposed under strict



observation of applicable national and international laws and norms, as well as internationally recognized human rights.

Business Partner hereby commits to ensuring that no employee is subjected to verbal, psychological, sexual and/or physical violence, coercion or harassment.

Approach to Discrimination

BARBE requires all its business partners and suppliers to integrate the equal treatment of all

employees as a core principle within their company policy. Business Partner therefore commits to eliminating and preventing all forms of discrimination on the basis of (but not limited to) ethnic, national or social origin, skin color, gender, age, religion, world view, political orientation and/or activity, membership of a trade union or employee representative body, handicap, sexual orientation or other personal characteristic or preference. Business Partner additionally undertakes to guarantee equal employment opportunities and to constantly uphold the respectively applicable legal provisions.

Climate Protection

Environmental and Climate Protection

The protection of people and the climate is an integral part of BARBE's policy. BARBE therefore requires Business Partner to take all possible steps to mitigate and minimize all and any climate-related impacts of its business activities, to actively protect the climate and the environment in accordance with internationally valid standards and legal provisions, and to continually seek to improve the effectiveness of its efforts in this regard. This includes avoiding emissions and waste wherever possible, as well as taking steps to raise resource efficiency continually. Business Partner hereby commits to taking suitable and demonstrable measures for this purpose, and to implement formal management systems (e.g. in accordance with ISO 14001 or another management system fulfilling a comparable standard) to ensure climate protection. BARBE-Group requires Business Partner to ensure the safe, environmentally sustainable development and manufacture of its products, their packaging, and their transportation.

BARBE selects and evaluates its business partners based on climate, safety and security performance among other aspects.

Waste and Emissions

BARBE requires Business Partner to maintain procedures and systems that guarantee the safe and secure handling, transportation, storage, recycling, reuse and management of raw materials, other business materials, and waste. Business Partner hereby commits to minimizing the generation and disposal of waste, as well as every form of release or emission of materials into the air, water and/or soil that could have negative impacts on human health, ecosystems and/or the climate. Further, Business Partner undertakes to handle, manage and treat all business materials and waste in an appropriate way before these are released into the environment, should this be unavoidable. Business Partner is required to prevent, or if unavoidable to minimize, the unintentional release, emission and/or leakage of hazardous substances into the environment by implementing and actively maintaining the corresponding procedures and systems. Further, BARBE requires Business Partner to implement and maintain procedures and systems that continually and sustainably optimize its consumption of all relevant resources such as energy, water and raw materials.



Process Safety and Security

BARBE requires Business Partner to implement and maintain a formal management system to steer its business processes in accordance with recognized safety and security standards. Where appropriate, Business Partner shall

carry out site and/or plant-specific risk analyses. Business Partner hereby commits to taking all reasonable measures to prevent incidents at all its sites and plants, for instance (but not limited to) chemical emissions and/or explosions.

Product Safety

Business Partner hereby commits to upholding all corresponding country and state-specific laws and legal requirements. Additionally, Business Partner undertakes to provide BARBE with all relevant product information, in particular on the composition, use (including but not limited to processing instructions, installation instructions, as well as occupational health and safety measures) and if required on the disposal of its products, in good time before

product delivery or service provision. Furthermore, Business Partner undertakes to provide BARBE with complete documentation of legal compliance of the products and services it provides, including (but not limited to) Material Safety Data Sheets and product labeling regulations. Business Partner shall include relevant information provided by BARBE in the corresponding documentation.

Implementation by the Business Partner

Business Partner hereby commits to actively informing its own employees as well as its direct suppliers and service providers of the requirements of this Code of Conduct, in order to guarantee their compliance with the requirements and stipulations this Code contains.

Should Business Partner have already implemented an own code of conduct or formal company policy containing all the obligations and requirements set out in this Code, BARBE requires Business Partner to provide documentary proof of Business Partner's full compliance with these requirements. Should Business Partner not have implemented its own code of conduct or formal company policy, it hereby agrees to commit to this Code of Conduct and all the obligations and requirements it contains, as detailed above.

BARBE explicitly recommends Business Partner to strive for continual improvement in all the areas detailed above with the aid of appropriate formal management systems.

Further, Business Partner hereby undertakes to cease and desist from all infringements or violations of the stipulations of this Code and to comprehensively examine potential improvement measures derived from such cases.

The Code of Conduct shall also apply to all companies owned and/or controlled by Business Partner as the parent company.

BARBE requires Business Partner to consistently disseminate and drive the communication and implementation of the requirements of this Code throughout its own supply chains.



Information and Communication

Business Partner can access this Code of Conduct at any time on the Internet at <https://www.barbegrup.com/en/company/code-of-conduct-for-suppliers>, print it if desired, and make it available in electronic or printed form to relevant employees.

Monitoring

BARBE reserves the right to monitor and check Business Partners' compliance with the requirements of this Code as detailed above, either through BARBE's own employees, independent third parties, certifications or other forms of official assurance, or by means of topic-specific on-site audits.

Sanctions and Corrective Measures

BARBE will treat every material violation by Business Partner of the obligations, requirements and stipulations of this Code as detailed above as a contractual infringement, and as such will consider taking appropriate legal steps on a case-by-case basis.

Where possible, BARBE will give Business Partner the opportunity to carry out corresponding corrective measures.

This agreement will be part of all contractual documentation with BARBE.



Please fill out and return a signed copy of this page to BARBE. Alternatively, and where applicable, you may send your own code of conduct or formal company policy as a documentary proof of your full compliance with our requirements.

Business Partner:
*official company name,
preferably parental company*

List of legal entities owned and/or controlled by Business Partner:
alternatively the list can be provided as a separate document

We hereby declare receipt of BARBE's Code of Conduct for Suppliers and its unrestricted acceptance.

Place, Date (dd.mm.yyyy):

Title, first name & surname:

Function:

Signature(s) of Authorized
Signatory/Signatories:

Business Partner's company stamp: