



# **Code of Conduct for Employees**

BARBE Group of Companies

Together for integrity and ethical behavior

**May 2024**

This code of conduct applies to all employees of companies of the BARBE Corporate Group, including employees of:

**Hans W. Barbe Chemische Erzeugnisse GmbH**

**Barbe (Thailand) Ltd.**

**Barbe America, Inc.**



The Barbe Group of Companies (hereinafter referred to as BARBE) develops, produces and distributes high-quality processing aids for various industries. In addition, customers are offered machines for optimum use of the products and a comprehensive consultancy service. We are a reliable partner for our customers worldwide, offering customized solutions and excellent service.

BARBE recognises its responsibility towards employees within its own company, towards customers and suppliers, in addition to the environment and society in general. Our actions are guided in particular by the values of integrity, fairness and respect, comply with national and supranational legislation as well as applicable international conventions and comply with the laws of the countries in which we operate. Our actions are guided by the principles of this Code of Conduct if local laws and regulations are less restrictive.

BARBE therefore supports initiatives and principles such as the United Nations Universal Declaration of Human Rights, the principles of the United Nations Sustainable Development Goals (SDGs), the United Nations Global Compact, the principles of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises, DIN ISO 9001 and DIN ISO 14001 and is committed to anchoring these in its corporate principles and procedures.

BARBE has joined UN Global Compact and fully supports its ten principles. All employees are encouraged to actively contribute to the fulfilment of these ten principles.

This Code of Conduct for Employees defines BARBE's requirements with regard to general business principles and fair competition, work and social standards, environmental protection and

product safety, which BARBE requires all employees to comply with.

The Code of Conduct applies to all BARBE employees. BARBE's global presence in different countries and regions may make it necessary to regulate standards of behaviour in subordinate guidelines and detailed operating instructions.

All employees are expected to read this Code of Conduct carefully, confirm it and act within the framework of these rules.

BARBE reserves the right to update the Code of Conduct if necessary and requires its employees to take note of this and expects them to behave accordingly.

BARBE does not tolerate any violations of this Code of Conduct.

This English-language version of this Code of Conduct is not the original version and has been translated. This document is published in the original German version and in other languages on the BARBE website.

## Compliance with national and international laws

As part of its regular business activities, BARBE supplies customers worldwide in many countries and regions where different legal systems apply. Compliance with all national and international laws applicable to the company's business is an obligation for both BARBE and all its employees. In addition to potential criminal prosecution by the legislator, any type of law violation can result in immediate labour law measures by the company.



The current versions of the health and safety laws which must be posted are accessible to all employees via the general information boards.

Compliance with statutory minimum wages is an obligation for BARBE.

Child labour or forced and compulsory labour are rejected in any form, both within the company and among the company's business partners, and are not supported or accepted in any way (not even tacitly).

## Principles of equality

BARBE is committed to a non-discriminatory working environment at every level. All personnel decisions are to be made objectively and based on performance, without any restrictions based on the personal characteristics of employees or applicants.

All employees should always be treated with respect.

Legal requirements (e.g. anti-discrimination law) must be complied with without restriction and implemented by the relevant supervisors in their area of specialisation.

## Sexual harassment

Sexual harassment is essentially characterised by unwanted, sexually motivated behaviour. This includes sexual physical contact, comments of a sexual nature in addition to the unwanted showing or visible display of pornographic images.

Sexual harassment, in whatever form, is not in line with the principles of our corporate culture and will not be tolerated by BARBE under any circumstances. Affected employees can contact the company's management directly at any time.

## Environment

BARBE recognises its responsibility towards society, the environment, the climate and biodiversity within its own company and in its cooperation with customers and suppliers. Protecting the environment, climate and biodiversity is therefore an integral part of our corporate policy. To achieve this, we aim to continuously reduce the environmental impact of our product manufacturing and business operations.

All employees are required to actively implement environmental protection at their respective workplaces and are trained to this effect as required. Details can be found in the BARBE environmental policy and the subordinate guidelines and operating instructions.

## Purchasing, requirements on business partners

BARBE makes procurement decisions on the basis of economic efficiency and sustainability. Details can be found in the BARBE purchasing policy and the subordinate guidelines and operating instructions.

BARBE expects its business partners along the entire value chain to assume joint responsibility for more sustainable production, respect for human rights and safe and fair working conditions in addition to compliance with environmental standards. Details can be found in the Code of Conduct for Suppliers, which must be applied and implemented by all employees when selecting suppliers and service providers or when working with them.

## Competition and anti-trust law



BARBE is consistently committed to free and fair competition. Among other things, this includes avoiding any type of agreements, coordination and other actions with competing companies which fall under the provisions of the applicable competition and anti-trust law. BARBE is convinced that long-term success on the markets can only be achieved through high product and service quality in addition to consistent customer orientation in all areas of the company. Competitive agreements hinder the quality-oriented optimisation of customer benefits and should be avoided at all costs.

## Bribery and corruption

BARBE expressly declares that the conclusion of supply and service transactions may not be brought about by criminal offences committed by one or more employees or any other person acting on its behalf. All persons employed by the company are bound by the law. They must act fairly, without personal interest and transparently.

The guidelines for the prevention of corruption are as follows:

- Corruption leads to personal criminal liability for the person acting in each case and possibly to claims for damages by BARBE.
- At BARBE there is an explicit intention to accept economic disadvantages if this avoids unfair business practices.
- Corruption prevention is a top priority.
- There must be a clear awareness at all levels of BARBE that corruption will not be tolerated under any circumstances. This awareness is supported and promoted by all managers.

As part of the prevention of corruption there is a fundamental ban on the acceptance of rewards

and gifts by business partners. Excluded from this are invitations to business meals or trade fairs customary in the industry, in addition to promotional items and smaller gifts in kind of an appropriate value on the occasion of socially recognised holidays. The accepted values are precisely regulated in the respective regions by company-specific operating instructions.

If a BARBE business partner directly or indirectly offers or provides an employee with a financial or non-financial advantage, a reward, a gift or any other pecuniary benefit, this must be reported immediately to the management.

Furthermore, employees are not permitted to carry out secondary employment (including unpaid work) for business partners with whom the company maintains business relationships. This does not apply to companies within the BARBE group of companies.

## Money laundering

BARBE employees are expressly prohibited from doing business with persons or companies involved in criminal or illegal activities with respect to the applicable money laundering laws and regulations. Money laundering is the introduction of financial resources from criminal or illegal activities into the legal financial cycle. Suspicious payment behaviour or unusual financial transactions by business partners must be reported immediately to the management.

## Foreign trade, export controls, embargoes and terrorism

BARBE undertakes to comply with all applicable foreign trade regulations, customs laws,



embargoes and similar restrictions in cross-border business transactions. The support and spread of terrorism and terrorist activities must be effectively prevented. For details, please refer to the following guidelines and operating instructions.

## Confidentiality

Employees to whom confidential information about the company, suppliers, customers or other business partners has been made accessible are bound to comply with internal confidentiality obligations which have been contractually agreed with the business partner in addition to statutory confidentiality obligations to protect the interests of the company. All employed persons are encouraged to inform their supervisors and/or management immediately of any unauthorised disclosure of confidential information.

## Data protection

All employed persons comply with the applicable data protection regulatory framework in addition to any supplements to BARBE's data protection regulations.

Personal data from employees, business partners and other persons may only be collected, processed or used insofar as this is necessary for specified and legitimate purposes. The use of such data must be transparent for the person affected (the person to whom the data relates); the rights to information and rectification and, where applicable, to objection, blocking and deletion must be safeguarded at all times.

## Communication with the public and authorities

Press and public relations work is the sole responsibility of the management.

This does not apply to communication with authorities within the scope of the employee's specified area of responsibility.