



MODERN CHEMISTRY



CODE OF CONDUCT



MATSEN CHEMIE AG
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Chairman of the Supervisory Board: Thorben Himmelskamp
Executive Board: Jan Hansen
Registered office of the company: Hamburg
HRB: 144749
VAT-Nummer: DE 309722393

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MODERN CHEMISTRY

For us, Modern Chemistry means linking our customers' requirements for chemical raw materials with our shared responsibility for the environment.

Our vision to offer our products exclusively carbon-neutral by 2035 is also tied to the understanding that the "chemistry" between all people we work with—whether internally or on the customer/supplier side—must be right. We believe all people are equal and must be treated as equals, humanely, and respectfully.

At MATSEN CHEMIE AG, we focus on what connects us: respect, tolerance, and hard work. We believe that success does not depend on external characteristics, but on the values we share. Therefore, we do not first analyze differences only to then celebrate diversity; instead, we rely directly on our common values. Gender, origin, or personal orientation play no role for us—we focus on performance and commitment. We are convinced that true strength lies in cooperation and that by focusing on what we have in common, we are further ahead than those who emphasize differences.



Business Ethics



COMMITMENT TO INTEGRITY

Our actions are guided by integrity. Through correct and honest decisions, we secure the daily value creation at MATSEN CHEMIE AG. Our reputation as a trustworthy partner, customer, supplier, and employer is strengthened by acting with integrity. This Code of Conduct is our common standard. It sets forth the principles that support us in making ethically correct decisions.

We are all responsible and committed to complying with our Code of Conduct and are aware of its importance. The MATSEN CHEMIE AG Code of Conduct is the foundation for fulfilling our corporate responsibility. Compliance with the laws and regulations of all countries in which we operate is our top priority. We do not take any action or omission that would lead to a violation of the law. No exceptions are permitted, even based on industry-standard or regional customs.

Furthermore, MATSEN CHEMIE AG is committed to the values recognized and applicable in free democracies. In our business activities, we particularly observe the following international standards and guidelines:

- [The United Nations \(UN\) Declaration of Human Rights](#)
- [The UN Convention on the Rights of the Child](#)
- [The 10 Principles of the UN Global Compact](#)



All employees are committed to integrity through a clause in their employment contract and further clearly communicated rules. This commitment is renewed annually during performance reviews. Every MATSEN CHEMIE AG employee is expected to read the Code of Conduct, ask questions if something is not understood, and follow it.

Furthermore, it is expected that concerns be raised if misconduct is suspected. All managers are expected to lead by example and regularly familiarize their teams with the Code of Conduct and other company policies and procedures.

Constructive criticism is encouraged and explicitly welcome. We provide the necessary time for the expression of criticism without undue delay. Retaliation or disadvantages imposed by superiors due to criticism will not be tolerated.





HUMAN RIGHTS, LABOR, AND SOCIAL STANDARDS

We respect and honor the dignity of our employees, customers, and business partners. In our actions, we always ensure that we act in accordance with human rights, the principles of the UN Global Compact, and recognized international labor and social standards. We expect our suppliers and business partners to do the same and provide them with our Supplier Code of Conduct for this purpose.

We want to ensure that our business activities and products do not contribute to human rights violations. At the same time, we strive to ensure that we source all materials and services from responsible sources. We particularly reject child labor, forced labor, and any form of exploitation.

We comply with the right to freedom of assembly, freedom of association, and collective bargaining, as well as relevant regulations for ensuring fair working conditions. The free choice of profession, equal pay, and the right to rest and regular paid vacation are firmly anchored in our company. It is an important concern for us to promote and maintain the health and safety of our employees. Within our sphere of responsibility, we promote social security and respect the right to freedom of opinion and expression.

All employees are responsible for creating a work environment that is diverse and inclusive.

We are all expected to build and promote a culture that welcomes diverse perspectives and provides everyone with the opportunity to contribute.





DIVERSITY, EQUALITY, AND NON-DISCRIMINATION

Our actions and communication with colleagues, business partners, and other stakeholders are professional, respectful, and guided by our view of humanity. We respect freedom of thought, opinion, expression, and religion.

We do not tolerate any kind of discrimination, such as that based on gender, age, skin color, origin, nationality, religion, sexual orientation, disability, political opinion, or union activity

We do not tolerate sexual harassment. This includes, in particular, unwelcome advances and assaults of a physical or verbal nature. There must be no direct or indirect discrimination regarding selection criteria in resource procurement. In personnel planning and recruitment, the focus is exclusively on the person's skills and competencies. Application and hiring processes must be open and transparent whenever possible. The working environment and personnel facilities must be designed so that they do not prevent employee equality. All employees should have the opportunity to develop in their work. Employees are granted equal career opportunities based on their qualifications and business requirements.





FAIR COMPETITION

As a globally active company, we are in constant competition. Fair competition is essential to us, as sustainable success is only achieved through lawful and honest competition. We believe that healthy and competitive markets promote growth and innovation. Anti-trust law protects and promotes effective and fair competition. Violations have serious consequences for both the company and the individual.

It is a fundamental principle of MATSEN CHEMIE AG that all its bodies, executives, and employees act in accordance with applicable antitrust laws.

Our standard is that we do not make or tolerate agreements with competitors regarding prices, price increases, conditions or capacities, profits, profit margins, costs, sales and marketing methods, or other competition-relevant factors.

We refrain from the inadmissible exchange of competitively sensitive information and coordinated behavior with competitors.

Likewise, we do not make agreements with competitors regarding non-competition, the restriction of business relationships with suppliers, the submission of bids in tenders, or the allocation of customers, markets, territories, or product portfolios.

NO CORRUPTION

MATSEN CHEMIE AG and its employees act responsibly and oppose all forms of bribery and corruption. In both the initiation and maintenance of business relationships, we are guided solely by objective criteria and not by private interests, relationships, or mate-



rial/immaterial personal advantages. Our goal is to avoid even the impression that benefits of any kind could be understood or viewed as consideration for a specific, desired behavior.

This applies especially to dealings with public officials. Gifts, hospitality, and travel expenses granted or accepted must have a legitimate business purpose and always be reasonable in terms of type and value. Approval must be obtained for all gifts, hospitality, and travel expenses. All requests and offers for inappropriate benefits must be reported. Invitations to meals must remain within the bounds of business courtesy and general customs. Invitations to business partners (e.g., to HSV home games) are permitted as long as they are transparent and within standard business practices. Guests are asked to report invitations according to their internal compliance guidelines. All employees receive regular training on corruption and bribery.

Donations, sponsorships, and memberships at MATSEN CHEMIE AG must comply with applicable laws and our internal policies. Furthermore, donations, sponsorships, and the establishment of memberships must not be linked to ongoing contract negotiations or the conclusion of business deals.





REPORTING COMPLIANCE VIOLATIONS

To enable confidential reporting of potential crimes or violations of laws or regulations by employees or management, compliance-relevant matters can be reported to the CEO of MATSEN CHEMIE AG. The identity of the whistleblower will only be disclosed to MATSEN CHEMIE AG if expressly permitted by the whistleblower or ordered by a government authority.



COMPLIANCE WITH FOREIGN TRADE REGULATIONS

Our principles include strict compliance with national and international country-related and person-related sanction regulations (embargoes). For foreign or security policy reasons, embargoes may be ordered that restrict freedom in foreign economic transactions with certain countries. We ensure that contracts involving funds or economic resources do not violate embargoes. As a global company, we follow current export control laws. All bodies and employees are required to familiarize themselves with and follow import and export control laws.





AVOIDANCE OF CONFLICTS OF INTEREST

We all have interests and personal relationships outside the company. Occasionally, these may overlap with our business activities or conflict with the interests of MATSEN CHEMIE AG, potentially causing financial or reputational damage. It is important to recognize, disclose, and appropriately handle potential conflicts

We must inform our supervisors of any actual or potential conflicts of interest. A conflict does not automatically constitute a violation of our Code of Conduct, but failure to disclose it does. Each situation is assessed individually, and measures are taken to ensure our culture of integrity is not compromised. All employees are required to make business decisions free from conflicts of interest and solely in the best interest of MATSEN CHEMIE AG.

A conflict of interest exists if objective decision-making could be influenced by one's own interests or those of third parties. We avoid situations that suggest a conflict of interest or its appearance.

We therefore avoid situations that could suggest a conflict of interest or the appearance of one. We are aware of the risk that donations, sponsorships, or memberships can be used to disguise corrupt payments.





COMBATING MONEY LAUNDERING

Money laundering is the disguised introduction of illegally acquired assets into the legal economic cycle to conceal their criminal origin. In many countries, this is a criminal offense. MATSEN CHEMIE AG does not tolerate violations of anti-money laundering laws and aims to enter into business relationships only with reputable partners whose activities comply with legal requirements.





HSE

HEALTH, OCCUPATIONAL SAFETY, SECURITY & ENVIRONMENTAL PROTECTION

At MATSEN CHEMIE, we are convinced that the protection of human life must be given the highest priority in all company actions. Through our commitment to excellence in health and safety, we create safe workplaces. We take technical, organizational, and behavioral measures to avoid accidents, injuries, and occupational diseases. Managers must guide and supervise their teams to ensure safe work. We comply with all relevant health and safety laws and company safety standards.

We identify and evaluate potential risks and include risk reduction plans in our business processes. We learn from incidents to avoid future problems and share these insights within the company and with stakeholders. Employee well-being is important to us; we focus on value-based, inspiring leadership and integrity. We strive for an environment where everyone feels valued and part of the team. Employees are encouraged to work on their personal and professional development. Further details are regulated in our "Working Conditions" and "Health and Safety Policy".

We act in an environmentally responsible manner and have implemented an ISO 14001 environmental management system. We strive to use energy and resources efficiently, avoid pollution, and minimize harmful effects. We monitor how our operations affect air, climate, water, land, biodiversity, and people. Our goal is to minimize direct and indirect negative impacts. MATSEN CHEMIE AG supports science-based measures to reduce climate and biodiversity impacts. We continuously measure risks and promote the use of the best available technologies. We expect our partners and employees to share this



commitment and share best practices. Chemicals and hazardous substances must be handled safely according to recognized management systems.

Our office spaces are protected by security measures. Every employee should be alert to security risks and report unauthorized access or incidents immediately.



PROTECTION OF COMPANY PROPERTY AND BUSINESS SECRETS

Property of MATSEN CHEMIE AG may only be used for business purposes. Every employee is a trustee responsible for protecting it from loss, damage, or theft. This includes office materials, samples, and products. Business secrets and sensitive information must be treated confidentially and protected from unauthorized persons. Employees with access to such information must not disclose it to third parties (including family and friends) or use it for non-business purposes.



**§DSGVO**

DATA PROTECTION

The protection of personal data of our customers and employees, as well as respect for national, European, and international data protection regulations, is a matter of course for us. We process personal data only after weighing individual interests and evaluating data protection risks. Our security standards aim to prevent unlawful use by unauthorized persons. Our business partners are also required to handle such data with care.

Hamburg, March 24, 2025

