

▶ Code of Conduct

At HOBUM Oleochemicals GmbH, we are committed to the basic principles of sustainability, safety, and integrity. Compliance with these principles is our top priority and we expect the same from our business partners. The following "Code of Conduct" describes our convictions and reflects what HOBUM stands for.

Compliance

At HOBUM, we comply with all laws and regulations relevant to us and expect the same from all our business partners. In addition, we expect our partners to comply with all the principles set out here and to establish their own compliance regulations. Failure to comply with the regulations set out here may result in the termination of the business relationship.

Sustainability

At HOBUM, we are committed to the 17 UN Sustainable Development Goals (SDGs) and are a member of the UN Global Compact Network. By processing renewable raw materials, HOBUM has been placing the concept of recycling and thus climate protection and sustainable management at the heart of our strategic orientation for over 65 years. Our commitment to human rights and adherence to the Hamburg oil mill collective agreement (IGBCE) underline our social orientation.

In addition, we maintain an internal company foundation for, among other things, subsidised housing for active employees.

Safety

The safety of our employees in the workplace must be always ensured. This also applies to activities that do not take place at the company headquarters, e.g. when working remotely or on business trips. We constantly review the safety of our manufacturing processes and other workflows with the help of risk assessments and implement technical improvements with the involvement of our employees and the works council.

The safety of our products must always be guaranteed. We ensure compliance with legal requirements, that our safety data sheets are up to date and that our products are labelled accordingly.

We expect the same safety precautions from our business partners.

Integrity

We are convinced that long-term economic success can only be achieved through partnership-based behaviour towards all market participants. We stand for fair competition based on all national and international market rules. Respect for and compliance with personal and property rights are non-negotiable. Any form of bribery or corruption is strictly rejected. All business transactions are documented transparently and verifiably and are available for review at any time.

This 'Code of Conduct' applies to all shareholders, employees and business partners of HOBUM. It is supplemented and specified by the following guidelines.

Information security

Information security at HOBUM is based on three key principles: confidentiality, integrity and availability. We are committed to upholding these principles in all areas of our company.

- **Confidentiality:** We protect all sensitive information, whether digital or physical, from unauthorised access. Access to confidential data is strictly controlled and only granted to authorised employees.
- **Integrity:** All information must remain accurate and unchanged. We use appropriate mechanisms to protect data from manipulation and ensure its accuracy.
- **Availability:** We ensure that all necessary information and systems are always accessible to ensure the smooth operation of our company.

Responsibility for information security lies with every individual in our company. All employees are required to adhere to the established security guidelines and to participate in regular training to learn about current threats and protective measures. We promote awareness of the importance of information security and strengthen confidence in our security practices.

Security incidents, such as data loss or unauthorised access, are treated with the highest priority at HOBUM. All employees are required to report incidents immediately so that countermeasures can be taken without delay. We conduct a thorough investigation to determine the causes and prevent future incidents.

We also expect our business partners, service providers and suppliers to adhere to the same high standards of information security.

Information security is an ongoing process. We are committed to regularly reviewing new developments and best practices and adapting our security measures accordingly. Our goal is to involve all employees and partners in the continuous improvement of information security to ensure the long-term security and protection of information.

Customer health and safety

As a player in the chemical industry, it is essential to use resources consciously to be able to control our own activities. For HOBUM, conscious use also includes the responsibility to consider further processing steps and to demonstrate the best possible handling.

The products that are passed on to customers are subject to constant checks and quality tests before shipment. Only products that meet our quality standards are released for sale.

HOBUM regularly reviews its own potential hazards to adapt the recommendations for use of its products if necessary.

Each product that is passed on to customers is accompanied by a safety data sheet in accordance with the REACH Regulation, among others, to ensure safe further processing.

When hazardous substances are used, it is always pointed out that these are hazardous substances and must be handled with particular care.

Labour and Human Rights

In accordance with the definition from the United Nations Global Compact, we respect and protect human rights. We are committed to our responsibility to comply with internationally recognised labour and human rights standards, including the Universal Declaration of Human Rights.

At HOBUM, we are committed to the social market economy. We promote and support the existence and role of our works council and maintain our social partnership with the labour union "IGBCE". In this respect, we are committed to collective bargaining and honour collective agreements. Equal pay for equal work without differentiation, e.g. according to gender, origin, skin colour and religion, is a matter of course for us.

As a chemical company, we are aware of the risks of our actions. The physical integrity of all people is our top priority and is monitored and strengthened by the independent position of the occupational safety specialist and the persons authorised to protect our environment.

Our goal is to ensure no work losses due to operational activities. All information required for operations is always accessible to all employees and in the most important languages. These mechanisms enable us to always guarantee the health and safety of our employees.

We offer our employees professional development and training courses for their personal and professional development and cover the costs. Both employee wishes and operational concerns are considered.

We prohibit any kind of discrimination, harassment or bullying and punish such offences with all disciplinary and labour law measures at our disposal.

Prohibition of child labour

We comply with the provisions of ILO Convention No. 138 concerning the minimum age for admission to employment and No. 182 concerning the prohibition of the worst forms of child labour.

Sustainable Procurement

All suppliers of chemical raw materials must be certified in accordance with DIN EN ISO 9001 ff. Certification in accordance with DIN EN ISO 14001 is desirable and is viewed favourably when selecting suppliers.

Where possible, we source our raw materials from Europe and aim to continuously increase our regional sourcing. Bulk quantities are procured in full tankers or combined deliveries.

We aim to approve at least two suppliers for each raw material to always maintain our security of supply. In addition, we endeavour to maintain a constant and sufficient stock level so that we do not have to reorder small quantities at short notice in an uneconomical manner.

HOBUM commits to observe ecological, ethical and social standards when selecting partners both in its own supply chain and in the sale of the goods it produces. HOBUM also commits to continue taking measures to prevent or abolish child labour and forced labour. Partners outside the European Union are amenable to international systems to prevent human rights violations along the supply chain. Partners within the European Union are amenable to the general legal standards of the European Commission.

We expect our business partners and suppliers, domestic and abroad, to strictly reject any form of child labour, forced labour, human trafficking or other forms of exploitation of dependent employees. We require written confirmation of compliance with this policy as part of our supplier self-assessment. In this respect, we fully support

the ILO labour standards. We are committed to provide information on the status of the supply chain in our sustainability reporting. Our suppliers commit to comply with our standards, in particular this 'Code of Conduct'.

When selecting our packaging, we focus on reusable or recycled containers. In accordance with our quality assurance, raw material purchasing should be coordinated so that delivered packaging can be reused without extensive cleaning activities.

Hazardous substances are substituted in accordance with TRGS 600. The purchase of hazardous substances is reduced to a technically necessary minimum.

When purchasing energy (electricity, steam) and concerning wastewater, we work together with our neighbours in the industrial environment to develop environmentally friendly overall solutions.

Managing water resources

Water is the central element of life and has an existential benefit for our society. The Federal Republic of Germany's national water strategy provides guidance on how to use water resources more sustainably.

As a player in the chemical industry, we rely on water both in our products as well as in cooling and heating processes. As a natural resource, water is therefore irreplaceable.

HOBUM ensures that the legal framework for water management is complied with and constantly strives to reduce its consumption of water.

We expect not only our own production standards to be conscious and sustainable in their use of water, but also those of our suppliers and customers.

Environmental protection

Avoiding or reducing waste is a top priority for HOBUM. When selecting our packaging, we focus on reusable or recycled containers. In accordance with our quality assurance, the purchase of raw materials should be coordinated in such a way that delivered packaging can be reused without extensive cleaning.

The purchase of hazardous substances has already been reduced to a technically necessary minimum.

We join forces with our neighbours in the industrial environment when it comes to the procurement of electricity, water and wastewater issues. The goal is a 42% reduction in Scope 1 and 2 factors by 2030 and a 95% reduction by 2050. HOBUM always strives for the most energy-efficient solution when optimising its processes. HOBUM attaches particular importance to purchasing products with biogenic carbon content and strives to continuously increase this share.

To achieve our goals, we work closely with the relevant authorities and stakeholders in Hamburg. It is a natural course of action that we critically examine our own water usage and establish more efficient processes. Our goal is to use as little fresh water as possible and to use it as effectively as possible in cycles. This is to prevent contamination and pollution of the water.

We want to actively involve not only our suppliers and service providers in the discussion about active environmental protection, but also our customers through the development of new, environmentally friendly products. Emissions and pollution are monitored, processes optimised and investments geared towards protecting the environment. By 2030, we want to start converting our processes to use climate-neutral, green hydrogen and then continuously convert our energy production. The same applies to our transport.

Any waste generated is disposed of professionally by competent partners in accordance with the applicable regulations.

Corruption and money laundering

Corruption in general refers to the possible bribery of partners along the value chain, customers or public officials. Bribery benefits individual companies and can therefore distort competition and prevent sustainable and fair business practices.

HOBUM is committed to combating corruption and bribery in the course of its business activities. We punish such violations with all disciplinary and labour law measures at our disposal.

HOBUM commits not to give or receive gifts or cash payments to or from decision-makers.

We advocate fair treatment within the framework of legal regulations and compliance with social obligations. HOBUM stands for fair competition with all its partners and endeavours to always prevent corruption. Naturally, we also require this attitude from our partners. To prevent the illegal use of funds, we reject all forms of money laundering. HOBUM is committed to preventing money laundering and acts against all forms of money laundering. We expect this behaviour from all our employees, partners and customers.

Ethical conduct

At HOBUM, we are committed to the social market economy. We are committed to preventing all anti-competitive practices available, whether in our own business activities or when brought to our attention by other parties.

We promote and support the existence and role of our works council and maintain our social partnership with the IG BCE. In this respect, we stand by our collective bargaining agreements and comply with collective agreements. Equal pay for equal work without discrimination, e.g. based on gender, origin, skin colour and religion, is a matter of course for us.

HOBUM rejects any form of fraud, whether through active misinformation or active withholding of information. Fair competition is only possible through open interaction with one another and forms the basis of HOBUM's economic activities. We also expect this behaviour from all our customers and partners.

HOBUM firmly rejects any form of corruption, bribery and money laundering. Detailed information and obligations on this subject are set out in our 'Corruption and Money Laundering' policy, which is part of our compliance system.

Product Use Policy

As a manufacturer of oleochemical products, it is a central concern for us to minimize the environmental impacts arising from the use of our products by customers. We rely on the use of bio-based and recycled raw materials to offer products with the lowest possible local environmental impact during use, and we provide our customers with the necessary information for environmentally sound further processing.

The key principles of our product use policy include:

- **Environmentally sound product development:** We consistently develop our products with the goal of keeping their local environmental impact during use by customers as low as possible. In doing so, we take into account criteria such as the use of bio-based raw materials, the optimization of biodegradability, resource efficiency and the avoidance of hazardous ingredients.
- **Transparency and customer information:** We provide our customers with comprehensive information on the environmental properties of our products, including up-to-date safety data sheets in accordance with the REACH Regulation, to enable environmentally sound further processing.
- **Resource conservation and waste avoidance:** We aim for a disposal rate of less than 1% per ton produced and promote the recycling of materials and raw materials that cannot be saved. We expect our customers and partners to handle our products in a correspondingly responsible manner.

Conflicts of Interest

A conflict of interest arises when the personal interests of an employee, manager or shareholder are in conflict with the interests of HOBUM Oleochemicals GmbH, or create the appearance of such a conflict. HOBUM is committed to handling and avoiding potential conflicts of interest in a transparent manner.

Our principles for dealing with conflicts of interest include:

- **Disclosure obligation:** All employees, managers and shareholders are required to disclose potential or actual conflicts of interest to their line manager or the management without delay. This applies in particular to business relationships with companies in which personal interests are held, as well as to family or personal relationships with business partners.
- **Impartiality in decision-making:** Where a conflict of interest exists, the persons concerned do not participate in the relevant decision-making processes. Business decisions must always be made exclusively in the interest of HOBUM and on the basis of objective criteria.
- **Secondary employment and shareholdings:** Secondary employment and shareholdings in companies that compete with HOBUM or maintain business relationships with HOBUM require prior approval from management.
- **Handling of gifts and benefits:** The acceptance or granting of gifts, invitations or other benefits that are likely to influence business decisions is prohibited. Only customary and low-value promotional gifts within the limits prescribed by law are permitted.
- **Documentation and consequences:** Reported conflicts of interest are treated confidentially and documented. Violations of this policy will be penalised with appropriate disciplinary and employment law measures.

HOBUM creates an environment in which employees can openly raise potential conflicts of interest without fear of disadvantage. This policy applies to all shareholders, employees and business partners of HOBUM.