

Code of Conduct

2025

- L. Brüggemann Verwaltungs-GmbH
- L. Brüggemann GmbH & Co. KG
- Brüggemann Alcohol Heilbronn GmbH
- BrüggemannAlcohol Wittenberg GmbH
- BrueggemannChemical Asia Ltd.
- BruggemannChemical U.S., Inc.
- Auserpolimeri s.r.l.



Foreword

Taking social responsibility has a long tradition at Brüggemann. Relationships with employees and business partners are designed to be long-term and are characterized by a high degree of reliability. Furthermore, Brüggemann is committed to sustainable development in the chemical industry. With this Code of Conduct, Brüggemann undertakes to comply with the following principles.

Formal review mechanism: This Code of Conduct is reviewed annually and amended if necessary. If changes are made during this period, they will be made independently of the regular review cycle.

Person(s) responsible: Management and Compliance Officer, Dr. Isabella Hebeiß

Scope: This guideline applies to the entire group of companies, including all domestic and foreign subsidiaries. The contents and values of this Code of Conduct are binding for all employees. They undertake to "live", observe and implement the indispensable values and content enshrined herein.

Recognition of employees: This Code of Conduct is communicated to all employees annually and documented by a training certificate. New employees are also trained on our Code of Conduct. By signing or electronically confirming, our employees undertake to comply with the principles of our Code of Conduct and to ensure that they are acted upon.

1. Compliance with the law & fraud

Brüggemann undertakes to strictly comply with all national laws and internationally recognized standards, guidelines and principles that are applicable in each case.

We do not tolerate any form of fraud, corruption, theft or other illegal activities. Every employee is obliged to comply with the law at all times in their professional activities and not to tolerate or carry out any actions that could violate applicable laws. We expect all employees to act honestly and with integrity and to immediately report any suspicions of fraudulent or illegal activities. Failure to comply with these principles may result in disciplinary action, up to and including immediate termination of employment. Our integrity and reputation as a company depend heavily on the law-abiding and ethical behavior of each individual.

2. Corruption & bribery

Our integrity is non-negotiable, and we are actively committed to fighting corruption and fraud in all its forms. As part of this effort, we regularly conduct awareness training to raise awareness of corruption prevention. Brüggemann condemns all forms of corruption and bribery in the strongest possible terms. We strive to conduct business in a transparent and ethical manner, without bribery, extortion, or other undue influence. Any attempts to influence employees, customers, suppliers or government officials through unauthorized payments, gifts or other benefits are strictly prohibited. We are committed to complying with anti-corruption laws and regulations in all countries and regions in which we operate.

3. Money laundering

Brüggemann is committed to combating and preventing money laundering in all its forms. We recognize that money laundering is a serious crime that not only undermines the trust of our customers and business partners but can also have a significant negative impact on society and

the economy. We strictly adhere to all relevant anti-money laundering laws and regulations and take reasonable steps to ensure that our products and services are not used for illegal purposes. Our determination to combat money laundering reflects our commitment to integrity, legality and ethical behavior.

4. *Conflicts of interest*

We are committed to avoiding conflicts of interest and to putting the interests of the company before personal interests in all professional decisions and actions. A conflict of interest exists when an employee's personal interests conflict with the interests of the company and could impair the objective performance of his or her duties. This may be the case, for example, if an employee has a direct or indirect financial interest in a company that competes with our company or has a business relationship with it. It is important to disclose potential conflicts of interest at an early stage and to take measures to resolve or avoid these conflicts. Every employee is encouraged to report potential conflicts of interest, either by disclosing them directly to their line manager or by using the channels provided for conflict resolution.

To counteract this situation, Brüggemann has implemented a guideline for dealing with gifts and invitations in the company. This is intended to help establish uniform rules with regard to gifts and invitations and to act in accordance with the law.

5. *Competition*

Brüggemann is committed to maintaining fair and transparent business practices and to refraining from any form of anti-competitive behavior. We respect the right to fair competition and comply with all applicable competition laws and regulations in the markets in which we operate. This includes the avoidance of cartels, price fixing, market manipulation and any other unfair competitive practices. Our employees are required to adhere to these principles and not to take any actions that could impair competition. We promote open and fair competition that fosters innovation and quality and ultimately contributes to the benefit of our customers and society.

6. *Human rights, working conditions and health protection*

The protection of and respect for human rights form the foundation of our actions and are non-negotiable principles that we respect in every aspect of our activities. We are committed to upholding the dignity, freedom and equality of all people, regardless of their origin, gender, religion, sexual orientation or other personal characteristics. We support the right to freedom of expression, the integrity and safety of every individual and protection against discrimination, exploitation and injustice. Our actions are always aimed at promoting and protecting these fundamental human rights, both within our organization and in our interactions with others.

At Brüggemann, we strongly condemn all forms of child labor, forced labor and human trafficking. We are committed to ensuring that these practices are not tolerated or supported within our organization or by our suppliers and business partners. Through comprehensive measures such as risk analyses and a code of conduct, Brüggemann ensures that child labor, forced labor and human trafficking are prevented. In addition, we are actively committed to supporting our young and disabled employees by establishing a youth and trainee representative body (JAV) and a representative body for severely disabled employees (SBV). These bodies are designed to represent the interests of both groups and thus contribute to strengthening human rights within our company.

Good working conditions are a central part of Brüggemann's corporate culture and we are committed to ensuring that they meet the highest standards. Our aim is to create a working environment that is characterized by respect and fairness. This includes ensuring health and safety in the workplace and strict compliance with legal regulations. Our working conditions are designed to promote the well-being and productivity of all employees and to create an environment in which they can develop their full potential.

In our annual "Prima Klima" brochure, we provide information on voluntary social benefits available to our employees. We take a site-specific approach at various levels, including the promotion of places in a daycare center in Heilbronn, the establishment of long-term accounts for the possibility of paid leave within the employment relationship at the German sites, as well as the promotion of health, for example through participation in gym fees or participation in a variety of joint, health-promoting leisure activities.

Occupational health and safety is critical to the well-being of our employees and the integrity of Brüggemann. We are committed to creating a safe and healthy working environment that minimizes risks and prevents accidents and damage to health. This includes providing appropriate training, personal protective equipment and safe work instructions for all employees.

We are also actively committed to complying with all relevant health and safety legislation and promote a culture of openness and engagement. Our employees are our most valuable asset, and their well-being is our top priority.

At Brüggemann, we also consider the health and safety of our customers to be our top priority. We are committed to producing the highest quality products that meet strict safety standards and protect the health of our customers. Our goal is to ensure that all Brüggemann products meet the highest standards of health and safety to enhance our customers' confidence and maintain their health.

To underline our commitment to sustainable and responsible corporate governance, we have been a signatory to the UN Global Compact since 2024. We are committed to complying with the 10 principles of the UN Global Compact and try to make our contribution to complying with and promoting the principles through responsible corporate governance.

7. Social dialog, career management and training

We value and promote the right to social dialog between the company and its employees as the basis for a harmonious working environment. With this in mind, we have set up a works council to represent the interests of our employees. Employee representatives are not discriminated against and have the right to exercise their function in the workplace. Our aim is to maintain consistency and trust through active exchange and interaction with our employees and their representatives.

At Brüggemann, we attach great importance to personal appreciation and fairness. We offer a wide range of development opportunities and are committed to developing and recruiting specialists and managers from within our own ranks. We also attach great importance to the professional training of apprentices in order to promote their professional development. Our aim is to offer our employees the best possible opportunities to develop both professionally and personally through training and further education, thereby also driving the success of the company. As part of the annual personal goals meeting, employees' individual development needs are discussed, and future training measures are stipulated to prepare them for future tasks.

8. Equal opportunities, equal treatment and inclusion

For us at Brüggemann, equal opportunities and inclusion are fundamental values that form the foundation of our working environment. We firmly believe that every employee - regardless of gender, origin, skin color, religion, sexual orientation, age or physical ability - should have the same opportunities to reach his or her full potential. Our aim is to promote a culture of diversity in which all voices are heard and in which every employee feels respected, supported and valued.

Our efforts to promote equal opportunities and inclusion extend to all areas of our company, from recruitment and promotion to day-to-day collaboration and interaction. We respect the rights and dignity of all employees and condemn any form of discrimination, harassment, or exploitation.

To reinforce these values, we have appointed an Inclusion Officer who offers all employees the opportunity to receive support and advice and to find out about their rights.

9. Information security & data protection

The security and confidentiality of information and data are of crucial importance to Brüggemann. We are committed to treating all information and data of our customers, suppliers and employees with the utmost care and responsibility. This includes personal data, trade secrets, intellectual property and internal company information. We implement appropriate security measures to ensure the integrity, availability and confidentiality of information and data and to protect ourselves against cyberattacks, data loss or unauthorized access. Every employee is responsible for protecting the data that he or she receives or processes and may only use it in accordance with the applicable guidelines and regulations. In addition, we inform all data subjects transparently about the use of their data and respect their rights to information, correction, deletion and objection in accordance with the applicable data protection regulations. Data breaches are taken seriously and are reported, investigated and rectified immediately. Breaches of information security can have serious consequences, including disciplinary action and legal action. It is our shared responsibility to protect the confidentiality and integrity of information and to maintain the trust of our customers and business partners.

To ensure that our employees are always up to date, we hold regular training courses on data handling and cyber security.

10. Environment

As a manufacturer of chemical products, Brüggemann makes all attempts to avoid generating air emissions, wastewater, and waste. It is our goal to continuously minimize these by taking measures to reduce our environmental impact. We achieve this, for example, through the ongoing modernization and further development of environmentally friendly production processes. Our quality and environmental management systems are certified in accordance with the DIN EN ISO 9001 and 14001 standards.

Environmental protection is firmly anchored in our corporate policy. We are committed to protecting the environment and conserving natural resources. The principle of "responsibility for the future" (sustainable development) is therefore an integral part of our thoughts and actions. We are continuously expanding our knowledge of potential risks, the environmental compatibility of our

products and the energy relevance of our processes. The knowledge we gain forms the basis for defining safety, environmental protection and energy efficiency measures.

11. Environmental and climate protection (energy consumption & greenhouse gases)

The continuous increase in energy efficiency and the reduction of Scope 1 to Scope 3 emissions are Brüggemann's declared corporate goals and are firmly integrated into the company organization through a certified energy management system for our production sites in Heilbronn and Lutherstadt Wittenberg.

To this end, we systematically identify potential energy savings and create the basis for energy-related investment decisions. Brüggemann pays particular attention to the reduction of Scope 1 and Scope 2 emissions that arise directly and indirectly from our operating activities. We do not keep the experience we have gained to ourselves. Together with other well-known companies in the region, Brüggemann is a member of the "Heilbronn Franken Energy Efficiency Table" and is committed to the resource-saving and environmentally friendly production of quality products.

12. Waste, chemicals and air pollution

Brüggemann actively strives to prevent the generation of waste and avoidable chemicals where conditions permit. If this is not possible, we are committed to reducing the amount of waste and hazardous chemicals generated during production. Our focus here is on reusing waste products in whole or in part before they are collected separately and disposed of properly. We enable the reuse of various materials such as Bruggolite® and Zinc carbonate by using collection containers in different colors.

As a manufacturing company, our aim is to reduce air emissions such as noise and air pollutants and, ideally, to avoid them altogether. To this end, we implement various measures, including regular measurements of noise levels, analyses of air pollutants and monitoring of ambient air quality and fugitive emissions. In order to achieve continuous improvements, we rely on the latest technologies and the optimization of our processes.

Our overriding goal at Brüggemann is to reduce waste, avoidable chemicals and air emissions or, if possible, to avoid them altogether.

13. Product use and end of life

As part of our commitment to sustainability and environmental responsibility, Brüggemann is committed to developing, manufacturing and promoting our products in a way that minimizes the environmental impact of their use and end of life. Our product strategy is based on the principles of resource conservation, durability and recyclability in order to minimize the ecological footprint over the entire life cycle.

To ensure sustainable product use, we provide our customers with clear information and instructions. This includes recommendations for environmentally friendly use and advice on responsible disposal at the end of the product life cycle. Brüggemann sees it as its mission to support its customers and partners in reducing their environmental impact.

Through continuous research and development, we strive to provide innovative solutions that enable sustainable use and advance global efforts to protect the environment. Our products not

only stand for quality and functionality, but also for our commitment to making an active contribution to a sustainable and livable future.

14. Water

Our corporate commitment to the responsible use and management of water resources is a central component of our sustainability strategy. We continuously strive to minimize our water consumption and reduce wastewater emissions. Through the targeted use of efficient technologies and processes, we are actively committed to maintaining water quality and protecting the surrounding water bodies.

As part of our efforts, we carry out regular quality assessments of our wastewater to ensure that our wastewater emissions meet strict environmental standards. We also invest in innovative

technologies and processes to recycle or reuse water in order to use our water resources efficiently and minimize our environmental footprint.

Our annual water protection report is a key component of our transparency and responsibility policy. It provides a comprehensive overview of our water management and use within the company. This report serves to monitor our progress, identify potential areas for improvement and ensure compliance with legal regulations.

15. Customer health & safety

Brüggemann is actively committed to promoting health and safety issues in all areas of application. Our aim is not only to ensure the health and safety of our employees, but also that of our customers.

The safety and well-being of our customers is supported by various measures within the company and is an integral part of our quality management system, which is certified in accordance with ISO 9001:2015. All quality assurance and risk management processes and standards therefore contribute to the safety and health protection of our customers.

16. Sustainable procurement

We strive to ensure that our suppliers and subcontractors fully comply with our social, environmental and sustainability principles. By implementing a corresponding Supplier Code of Conduct, we oblige our suppliers to strictly comply with our requirements. We rely on measures such as supplier qualification, supplier self-disclosure and other accompanying measures to ensure compliance with these principles.

The rules and guidelines for the entire Brüggemann group of companies are standardized in our purchasing guidelines.

17. Reporting violations and sanctions

If employees observe or learn of a violation of this Code of Conduct or of applicable laws and regulations, they are required to report this to management immediately. These reports will be treated confidentially and anonymously and will be seriously investigated. There will be no



retaliation against employees who report violations as long as the report is made in good faith and no false accusations are made. Every employee, as well as every other stakeholder, has the right and responsibility to raise concerns about ethical behavior or violations of the law in order to protect the integrity and reputation of our company.

Dedicated reporting channel:

- Whistleblowing Hotline: +49 511 330603-70
- Whistleblowing Website: <https://brueggemann.ak-compliance.de/>
- Person responsible for compliance: Management, Isabella Hebeiß

Disciplinary action: We take breaches of this Code of Conduct seriously and will take appropriate disciplinary action if an employee breaches its provisions. These measures may range from a warning or training to sanctions such as warnings or transfers, to termination of employment. The type and severity of the measure depends on the seriousness of the breach and the circumstances of the individual case.