

CODE OF CONDUCT

for the companies

Peter Greven GmbH & Co. KG

Peter Greven Nederland C.V.

Peter Greven Physioderm GmbH

Peter Greven Asia Sdn. Bhd.

as well as

Norac Additives LLC

PREAMBLE

The companies Peter Greven GmbH & Co. KG, Peter Greven Nederland C.V., Peter Greven Physioderm GmbH, Peter Greven Asia Sdn. Bhd. and Norac Additives LLC acknowledge their social responsibility within the scope of their entrepreneurial activities worldwide. This Code of Conduct (hereinafter referred to as "CoC") serves as a guideline for entrepreneurial conduct for our group of companies as well as for our employees which at its core constantly accounts for its social responsibility. At the same time, it serves as our position statement on Human Rights. In this way, we are reacting to the different framework conditions created in a global market and face up to the challenges and social expectations which arise from the increasingly interlinked cooperation in global value chains. Through a signature, our contract partners also admit their social responsibility and obligate themselves to meet the core principles, which are written down within this CoC, as well as implementing them throughout the whole supply chain.

1. BASIC UNDERSTANDING

A socially responsible business management is one of the basic, core principles of entrepreneurial conduct. The results of all decisions are to be considered with respect to their economic, social and ecological aspects and in the context of an appropriate balance of interests. The Peter Greven group is committed to the Responsible Care Global Charter. The above companies voluntarily contribute within the limits of their capacities to the benefit and the sustained development of global society at all locations at which they are active. In so doing, they orient themselves on generally valid ethical values and principles and above all on integrity, honesty and respect for human dignity.

2. CORNERSTONES OF SOCIALLY RESPONSIBLE BUSINESS MANAGEMENT

The Peter Greven Group complies with all laws and regulations of the countries it is active in. It is committed to legally proper and recognised business practices, to fair competition and complies with the antitrust law, , trade control regulations and sanction regimes. It orients its conduct on generally valid ethical values and principles, especially on integrity, honesty, respect for human dignity and Human Rights, candour and non-discrimination of religion, world views, gender and ethics.

The undersigned companies reject corruption, bribery and money laundering as per the relevant UN convention¹. Not only a financial attempt at bribery but also other incentives such as gifts or entertainment which are not the natural course of business are strictly rejected. The companies promote transparency, ethical conduct and responsible management and control within their respective organisations in their way.

3. HUMAN RIGHTS

We see the protection of Human Rights as a core element of our entrepreneurial responsibility. The companies abide by human rights as per the UN Charter of Human Rights² and are committed to promoting them, especially the following:

Health and safety

The protection of health and occupational safety, especially the guarantee of a safe, health-promoting working environment, so as to prevent accidents and injuries.

Harassment

Protection of employees from physical punishment and from physical, sexual, psychological and verbal harassment or abuse.

Freedom of opinion

The companies protect and safeguard the right to freedom of opinion and expression.

Privacy

Protection of privacy and personal data. The adherence to the respective guidelines is observed by our data protection officer.

¹ United Nations Convention against Corruption (www.unodc.org)

² Universal Declaration of Human Rights, UN Resolution 217 A (III) from 1948

As the human rights are abided and promoted it can be confirmed that neither human trafficking nor sexual slavery are tolerated.

From our contract partners we expect to ensure that no products from civil war zones are supplied or products that contain conflict minerals which directly or indirectly finance or benefit armed groups and cause human rights abuses as outlined in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Countries (OECD DDG).

4. WORKING CONDITIONS

The companies abide by the core labour standards of the ILO. These apply among other things to

- ▶ the prohibition of child labour according to ILO Conventions 138 (Minimum Age) from 1973 and 182 (Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour) from 1999
- ▶ the prohibition of forced labour according to ILO Conventions 29 (Forced Labour) from 1930 and 105 (Abolition of Forced Labour) from 1957
- ▶ the promotion and, as far as possible, guaranteed application of the principle of the equal payment of men and women for work of equal value according to ILO Convention 100 (Equal Remuneration) from 1951
- ▶ honouring employee rights according to ILO Conventions 87 (Freedom of Association and Protection of the Right to Organise) from 1948 and 98 (Right to Organise and Collective Bargaining Convention) from 1949 to the extent permissible and possible in the respective countries
- ▶ the prohibition of discrimination according to ILO Convention 111 (Discrimination in Respect of Employment and Occupation) from 1958. This prohibition applies especially to the discrimination of employees on the basis of gender, race, age, disability, ethnic or cultural origin, religion or beliefs, or sexual orientation

Working hours:

The companies abide by labour standards regarding the longest permissible working times.

5. ENVIRONMENTAL PROTECTION

The companies fulfil the valid regulations regarding environmental protection at the respective locations. Moreover, they deal responsibly with natural resources. Through our certification according to DIN EN ISO 14001 for our European sites, we have committed ourselves to environmental protection in a manner that goes beyond legal provisions.

6. CIVIC INVOLVEMENT

The companies are contributors to the social, cultural and economic development of the countries and regions in which they are active and promote relevant voluntary activities on the behalf of their employees.

7. IMPLEMENTATION AND ENFORCEMENT

Peter Greven GmbH & Co. KG, Peter Greven Nederland C.V., Peter Greven Physioderma GmbH, Peter Greven Asia Sdn. Bhd. and Norac Additives LLC undertake all appropriate and reasonable efforts to implement and to apply the principles and values described in this CoC in a continuous way and, where necessary, to remedy any existing deficits as soon as possible. We have installed due diligence processes like a risk analysis that serve as a basis for our business, especially our supplier management. When risks are identified we implement due prevention measures, which can be found in our Palm Oil Sourcing Policy and other documents. Additionally, we have established a worldwide system available to employees and the general public on our Homepage through which possible compliance violations can be reported – anonymously if desired. We are committed to enabling the remediation of any adverse human rights impacts caused by our business activities. A governance structure is currently implemented in our organisation. Upon request and under the condition of reciprocal adherence, our contractual partners are entitled to receive information on the key measures so as to provide transparency with regards to how fundamental compliance with these measures is guaranteed. This does not entitle any party to proliferate confidential information related to the undersigned companies and their operations, competitive information or any other valuable information.

Decision of September 2014.
Last edited in August 2024

the management of
Peter Greven GmbH & Co. KG
Peter Greven Nederland C.V.
Peter Greven Physioderma GmbH
Peter Greven Asia Sdn. Bhd.
Norac Additives LLC

Signature contract partner