

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 Business Ethics Policy for entrepreneurial conduct for our entire group of companies, both domestic and foreign 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.

1. BASIC UNDERSTANDING

A socially responsible business management is one of the basic, core principles of entrepreneurial conduct. Governance and Due Diligence in regards to Human Rights including health & safety are material matters to us as identified in our double materiality analysis. 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 and gender. It is committed to the highest levels of integrity and transparency in all business activities. Any form of fraud, deception or other unethical behaviour will not be tolerated.

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 with integrity, avoiding conflicts of interest, and responsible management and control within their respective organisations in order to always make decisions in the best interests of the company.

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.

In the context of abiding and promoting Human Rights, also neither human trafficking nor sexual slavery are tolerated.

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

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

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, ENFORCEMENT AND KEY PERFORMANCE INDICATORS

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. For that we have defined concrete actions and indicators.

We have installed due diligence processes like a risk analysis with regard to human rights due diligence obligations that serve as a basis for our business, especially our supplier onboarding and management. When risks are identified we implement due prevention measures, which can be found in our Sustainable Procurement Policy and Palm Oil Sourcing Policy among others.

As part of compliance management, we have installed suitable control and complaints mechanisms, including, for example, the continuous review of personal and organisation-related sanctions lists and our general complaints system for all stakeholders as well as the whistleblower system under the Whistleblower Protection Act for internal employees. Reports of possible compliance violations or human rights violations can be recorded anonymously via our complaints system on the Peter Greven website at the following link: <https://www.peter-greven.de/en/code-of-conduct-complaint-form>

The process for reviewing complaints corresponds to the process described in our whistleblower system. The protection of whistleblowers is ensured in all cases. In cases where we cause or contribute to actual human rights violations through our business activities, we are committed to implementing effective remedial measures.

The Code of Conduct is shared with new employees during onboarding and is reinforced during the annual employee appraisals. By providing our employees with appropriate annual training in the areas of occupational health and safety, data protection and information security we ensure that our principles are continuously implemented and applied. In addition, we have appointed persons authorised by the management to be responsible for critical areas such as occupational safety, data protection, inclusion and sustainability.

Through their signatures, our managers commit to the principles of the Code of Conduct and undertake to actively implement them in their areas. They ensure that all employees are informed about the principles and support them in training and applying the defined values and behaviours.

Supplier Code of Conduct: Our Code of Conduct at the same time serves as our Supplier Code of Conduct through which we communicate our expectations towards our suppliers and their actions. By signing it, they also acknowledge their social responsibility and undertake to comply with the principles described in this CoC and to implement them throughout the entire supply chain.

We regularly measure our progress in these actions using various process indicators, for which we have set ourselves the following quantitative targets:

- We want to achieve an annual compliance rate of 100% for internal training in the area of responsible Governance and Due Diligence
- We plan to have our CoC signed by 100% of our suppliers by the end of 2025. So far, this has only been implemented for the European sites and will now be extended to the entire Group.
- We plan to have our CoC signed by 100% of our internal managers within the entire Group by the beginning of 2026.
- Our goal is to receive zero confirmed complaints about possible compliance violations or human rights abuses every year.
- Our goal is to have zero reportable workplace accidents annually

Responsibility for the content of the CoC lies with the Management Board. The CoC and the measures derived from it are regularly reviewed at least once a year by our sustainability management and adjusted as necessary in consultation with the Management Board. Interested stakeholders are informed of any significant changes.

Decision of September 2014.
Last edited in February 2025

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

Signature of contractual partners and internal managers:

I/We confirm that I/we have read and understood the Code of Conduct and that I/we undertake to comply with the stated principles. I/We acknowledge that confirmed violations of this policy may result in legal and/or disciplinary action.

Date, Name & Signature