

## Corporate Social Responsibility Policy Jungbunzlauer Group

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### Labour Standards

All Jungbunzlauer personnel is employed in compliance with respective national labour laws. Jungbunzlauer fully respects the rules of conduct stated in the International Labour Organization's (ILO) Fundamental Conventions as well as the Universal Declaration of Human Rights.

The following standards apply:

#### **A. Residence and Work Permits**

All employees are in possession of a residence and work permit according to national law.

#### **B. Employment Contracts**

All employees have a written employment contract which complies with the legal and collective contractual regulations of the place of employment.

Special conditions granted at the moment of employment under particular circumstances are justified and documented in writing and are immediately adjusted to the company's standard payment model. Wages may differ from this payment model, especially for reasons of motivation and as a reward for special achievements, but are justified and documented in writing.

#### **C. Responsibility to Employees**

Employment is freely chosen. There is no forced or compulsory labour and workers are free to leave their employer after reasonable notice.

All Jungbunzlauer companies are in compliance with the ILO conventions on child labour and the UN Convention on the Rights of the Child.

Discrimination due to personal characteristics such as gender, religion, race, etc. is not allowed. This ban on discrimination refers to recruitment, payment of wages, attribution of work, promotion and dismissal (in the event of a personnel cut for internal reasons).

All personnel are treated with dignity and respect. Jungbunzlauer does not engage in or tolerate the use of corporal punishment, mental or physical coercion, or verbal abuse of personnel. No harsh or inhumane treatment is allowed.

All personnel have the right to form, join, and organise trade unions of their choice and to bargain collectively. Where this is restricted under law, the employer should facilitate alternative means for independent and free association and bargaining.

#### **D. Health and Safety Conditions**

Jungbunzlauer provides a safe, healthy and hygienic workplace environment and takes effective steps to prevent potential accidents and injury to workers' health.

A system has been established to detect, avoid, or respond to potential threats to the health and safety of personnel.

Jungbunzlauer provides appropriate personal protective equipment to employees. In the event of a work related injury Jungbunzlauer provides first aid and assists the worker in obtaining follow-up medical treatment.

Health and safety measures are communicated to employees and responsibilities are clearly defined.

Training of all relevant employees on health and safety risks and good working practices are performed.

Jungbunzlauer's production plants adhere to the Responsible Care programme to improve health, safety, and environmental performance.

An Health, Safety, Environmental and Sustainability Policy has been issued by the Management Committee.

## **E. Implementation**

The observance of the above guidelines is the responsibility of the management of each Jungbunzlauer company. The companies' managers and executive boards immediately report to the CEO if any problems or non-compliance with these guidelines arise.

## **Code of Business Conduct**

At Jungbunzlauer, we aim to operate our business according to highest ethical, social and environmental standards. We have integrated a framework of principles, guidelines and policies that is communicated and available to all employees. The way we work is defined and characterized by applying these standards which we see as enablers to be a responsible and sustainable business partner.

Full compliance with local laws and local regulations is imperative and precondition to any and all business transactions. This includes, but is not limited to, compliance with regulation on financial accounting and reporting, competition law, employment law, anti-corruption regulation, export control and trade restrictions. Jungbunzlauer is committed to meeting its customers' and stakeholders' expectations that we supply high quality products which are sourced and manufactured in a fair, ethical and environmentally responsible way.

The following standards apply:

### **A. Conflict of Interest**

Jungbunzlauer employees are not allowed to perform services in competition with Jungbunzlauer, nor are they allowed to work as an employee, consultant, officer, or member of the board of directors of a company competing with Jungbunzlauer.

Jungbunzlauer employees are not allowed to be a supplier to Jungbunzlauer or work for a potential customer or supplier while employed by Jungbunzlauer, nor are they allowed to accept money or any benefit from a customer or supplier or potential customer or potential supplier for advice or services that relate to the customer's or the supplier's business with Jungbunzlauer.

Jungbunzlauer employees who hold a position where they have influence or control over the employment, dismissal, job content, job evaluation or compensation of any employee who is a relative or a personal friend or who is related to any such persons, must refrain from exerting such influence, and always refer such matters to an independent superior.

### **B. Bribery and Corruption**

Jungbunzlauer employees are not allowed to engage in bribery, extortion or kick-backs, whether to public officials or to private persons who are related to or may influence Jungbunzlauer's business or business opportunities, nor are they allowed to receive or demand any payment for themselves or their relatives or affiliates from government officials or from Jungbunzlauer's business partners or prospective business partners.

Accordingly, Jungbunzlauer's funds must not be used by employees to make payments, directly or indirectly (through intermediaries, such as partners, agents, distributors, service providers, consultants, family members, or otherwise), in money, property, services or any other form to a government official, political party, candidate for political office, or to any privately employed or engaged person to induce the recipient to 1) exert influence to assist the Company in obtaining or retaining business; or 2) commit any act in violation of a lawful duty.

## **C. Gifts and Entertainment**

All transactions with customers and suppliers are impartial, objective, and free from outside influence.

Jungbunzlauer has issued clear rules on exchanging gifts and entertainment. All expenses for gifts, entertainment and hospitality must be accurately registered in the expense accounts.

Jungbunzlauer employees must also report the receiving of gifts to their manager.

## **D. Money Laundering**

Jungbunzlauer supports anti-money laundering laws and policies and does not condone, facilitate or support money laundering in any form and has established procedures to avoid receipt of cash or cash equivalents that are the proceeds of crime.

## **E. Facilitation Payments**

Jungbunzlauer prohibits the use of illegal facilitation payments and to eliminate them from all business practises.

## **F. Financial Statements and Accounting**

Jungbunzlauer has established internal procedures and controls to ensure the consistency and accuracy of its accounting.

Jungbunzlauer employees are obliged to act in accordance with corresponding compliance objectives by disclosing all information that is relevant for accounting and financial reporting and auditing purposes to the relevant staff. This may include reporting of suspected fraud or other irregularities conducted by any employee or by any other person.

## **G. Competition and Antitrust**

Jungbunzlauer is committed to dealing fairly with customers, suppliers and competitors. We do not engage in anti-competitive sales practices, unfairly limit trade or attempt to exclude competitors from the marketplace. This means that while we compete vigorously, we act independently and in our own interest in all commercial situations affecting competitive conditions of trade and avoid practices that restrict competition.

Therefore, Jungbunzlauer's employees must, amongst others:

- never enter into any agreement or tacit understanding with competitors, such as on allocation of customers, sales territories or categories of products, coordination of bids or limitation of capacity
- avoid discussing competitive issues with competitors, such as on the price or other terms on which Jungbunzlauer or its competitors sell products and services, the customers to whom, or territories in which, Jungbunzlauer or its competitors sell products and services
- respect supplier's and customers' freedom to conduct their business as they see fit
- refrain from using any market power or market information in a way which may restrict competition
- avoid any use of coercion in the sale of products to customers, such as forcing a customer to purchase unwanted products, tying in or bundling
- not practise "predatory pricing" – i.e. selling products and services below cost to eliminate or harm competitors or
- refrain from unjustifiable criticism of a competitor's products or services or use deceptive advertising.

When Jungbunzlauer employees participate in trade or industry association functions, fairs and conferences, they must be careful not to exchange confidential data with competitors. Should any confidential data be improperly disclosed by a competitor, Jungbunzlauer employees must leave the meeting and have their departure recorded in the meeting minutes.

## **H. Trade Restrictions, Export Control and “Anti-Boycott” Laws**

Jungbunzlauer employees shall be aware that it may be illegal to sell a product to another party in circumstances where Jungbunzlauer either knows or has reason to believe that the products will ultimately be shipped to a country or entity subject to trade restrictions.

Jungbunzlauer Group companies are generally prohibited from complying with unilateral customer requests supporting restrictive trade practices, including boycotts against specified countries or against certain organisations or persons.

Jungbunzlauer employees shall contact their direct manager or a member of the Management Committee, if they are not comfortable conducting business with a particular entity or person not referenced by Jungbunzlauer’s Management Committee.

## **I. Market Intelligence**

Jungbunzlauer employees do not gather or use non-public information about competitors which is proprietary or confidential, no matter how obtained, and this type of information is not used to benefit Jungbunzlauer in any way.

Jungbunzlauer does not actively seek a third party’s confidential information or accept the receipt of confidential information without the owner’s consent.

Jungbunzlauer employees are not allowed to bring to or use any confidential information, including digital records, from their prior employers who compete with Jungbunzlauer or who are customers of Jungbunzlauer.

Jungbunzlauer employees are not allowed to use copyrighted materials or third-party trademarks (for example portions of audio, video and off-the-internet or off-the-air recordings) in material they are producing (including internet or intranet web sites) without specific permission from the copyright owner.

## **J. Data Protection**

Jungbunzlauer acknowledges and respects that according to many applicable data protection laws, in particular the General Data Protection Regulation (GDPR), the use of personal data is prohibited, unless a statutory requirement, the performance of a contract, the consent of the person concerned or a legitimate interest of Jungbunzlauer require or allow it.

Jungbunzlauer has implemented several global data protection policies in order to define and implement uniform standards. All employees, contractors and executives at any Jungbunzlauer Group company are obliged to comply with these policies.

## **K. Intellectual Property Rights**

Jungbunzlauer employees maintain the confidentiality, integrity and proprietary nature of all confidential information and intellectual property rights.

Jungbunzlauer respects third parties’ proprietary information and intellectual property rights and does not make any illegal use thereof or otherwise infringe thereon.

Unauthorised use of confidential information and/or intellectual property rights is reported to the Management.

## **L. Government Relations**

Jungbunzlauer representatives conduct themselves according to the highest ethical standards in all our dealings with governments and their agencies.

Although dealing with governmental agencies in the ordinary course of our business, Jungbunzlauer does not participate in party political activity.

## M. Reporting Violations

Jungbunzlauer encourages employees and external parties to inform the company of possible ethical or legal violations, in order to make it possible to investigate the issues, and to solve them. The reported issues are investigated with consideration, minimising damage to any innocent parties. Key target in any investigation is to stop any wrongful actions.

In general, it is suggested that any problems noted or suspected by the informers handled with the units, departments, or persons in charge of said issues, to ensure efficiency in handling of the issues. In cases where the informer does not want to contact the person in charge of the current issue, it is possible to contact the HR department, the senior management or the board of directors.

## N. Implementation

The observance of the above guidelines is the responsibility of the management of each Jungbunzlauer company. The companies' managers and executive boards immediately report to the CEO if any problems or non-compliance with these guidelines arise.

## Products and Service

Jungbunzlauer is committed to providing an overall positive experience to its customers, and establishing itself as a trustworthy, reliable, and professional partner. Jungbunzlauer is therefore committed to providing its customers with quality products, services and support which meet customer expectations, contract specifications, industry standards and relevant statutory requirements.

Jungbunzlauer offers safe products in line with our implemented product safety and HACCP (Hazard Analysis Critical Control Point) procedures. Packaging, labelling and documentation comply with the stringent European and North American legal requirements. All Jungbunzlauer sites are certified according to the requirements and guidelines of ISO 9001 quality management system and FSSC 22000 food safety management system.

The following standards apply:

### A. Rules to Observe

- Observance of the legal regulations on chemicals and foods, relevant legislations and codices, such as pharmacopoeias, specifications and standards on food additives, Codex Alimentarius, REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) etc.
- Assurance of product safety according to the product liability law (supervision of product ranges and recall, where necessary).
- Observance of declaration obligations according to the local law (product compound description, toxic classes, instructions for use, origin, date of production and validity, etc.).
- Observance of the applied quality standards, such as ISO 9001, FSSC 22000, etc.

### B. Implementation

The observance of quality standards must be ensured by the Corporate Quality Manager, who reports to the Vice President Manufacturing & Technology. The observance of Jungbunzlauer product relevant laws on chemicals and foods must be ensured by the Technical Service Managers, who report to the Product Management.

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This policy has been issued by the Management Committee and by all Jungbunzlauer companies. Compliance with these policy guidelines shall be regularly audited but at least every five years or when required.

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