



# Code of Conduct - for Suppliers

ASK Chemicals Group



**ASK**CHEMICALS



# Introduction

ASK Chemicals Group and its companies, subsidiaries, and affiliates (collectively, “ASK Chemicals Group”) consider integrity and compliance to be core values. We are committed to conduct our business according to the highest legal, ethical and moral standards. We owe our honesty and good faith when dealing with our customers, our suppliers, our employees, our competitors and other stakeholders. ASK Chemicals Group expects its employees and managing directors to follow the ethical principles stated in the ASK Chemicals Group Code of Conduct and any other compliance documents, and to act with good sense whenever engaging with others, whether colleagues or third parties.

ASK Chemicals Group also expects its business partners to operate their businesses with professionalism and integrity, share our social and environmental values, and acknowledge our quality and safety culture. Therefore, we are appealing to all our suppliers to conduct themselves in compliance with the applicable laws and regulations. These pillars are building the foundation for the success and reputation of the relationship between ASK Chemicals Group and its suppliers.

The ASK Chemicals Group “Code of Conduct for Suppliers” thus sets forth the minimum requirements for all suppliers to conduct business with ASK Chemicals Group. It shall form part of all our contractual relationships entered into between ASK Chemicals Group and its suppliers.

Hilden, October 2023

Frank Goede  
Chief Executive Officer  
ASK Chemicals GmbH

Dirk Volmer  
Global Procurement Director  
ASK Chemicals GmbH

## 1. Compliance with laws, regulations and ethical practices

ASK Chemicals Group performs its businesses in all major economies of the world in compliance with the applicable laws, regulations and ethical practices, international principles and conventions as well as with our internal policies. This Code of Conduct for Suppliers is a complement to our Code of Conduct and compliance documents. Therefore, we expect and encourage our suppliers to:

- reach the same level of compliance of ASK Chemicals Group by abiding this ‘Code of Conduct for Suppliers’ which also lines up with the international standards for environmental, social and corporate governance practices (ESG)
- improve ESG standards while implementing their own compliance management system
- use their best efforts to promote these standards among their subcontractors, suppliers and business partners throughout the supply chain.

## 2. Human Rights & Labor Practices

ASK Chemicals Group expects its suppliers to respect human rights of their employees including but not limited to:

- Work time: suppliers should comply with the applicable law and local sector-specific labor regulations concerning work time, including overtime laws.
- Ethical Recruitment: suppliers should practice non-discriminatory recruitment and merit-based selection processes

- Wages and benefits: suppliers should provide wages and benefits as prescribed by the respective national laws, including minimum wage legislation, and in line with existing practice in the industry and local labor markets.
- Non-discrimination and fairness: suppliers should apply the principles of equal opportunity and fair treatment when it comes to their employees and contractors. ASK Chemicals Group also encourages suppliers to provide an inclusive, diverse and supportive working environment.
- Freedom of association and collective bargaining: suppliers should recognize, as far as legally permitted, the right of free association and collective bargaining of employees.
- No forced labor: any form of forced labor, including forced prison labor, indentured labor, bonded labor, slave labor or any form of human trafficking is not tolerated.
- No child labor: suppliers should comply with minimum working age requirements prescribed by national laws and international agreements.

## 3. Ethical standards

### Fair Competition

ASK Chemicals Group expects its suppliers’ commitment to the principles of free competition:

- Contracts with business partners shall be entered into on fair and transparent terms.

- ASK Chemicals Group will not tolerate anti-competitive illegal practices including:
  - » price-fixing with competitors,
  - » agreements on market sharing or production capacities and,
  - » agreements to dictate or control a customer's resale price.
- Any kind of concerted action, informal talks or "gentlemen's agreements" that are intended to restrict competition, or may have the effect of doing so, are strictly prohibited.
- When a supplier issues a call for bids, all bidders will be treated equally.

#### Anti-Corruption

- Suppliers shall comply with the applicable anti-corruption laws and regulations in their business operations.
- Suppliers should not engage in or tolerate any form of corruption or bribery, in particular any payment, "kickback" or other form of benefit conferred for the purpose of influencing decision making.

#### Money Laundering

- Suppliers must abstain from participating in money laundering or terrorism-related activities or conduct business with any person or entity involved in those illegal activities and are expected to perform applicable due diligence processes.

### 4. Quality, Safety, Health and Environmental Protection

- Suppliers shall share our commitment to sustainable development and our economic, ecological and social concerns, embracing quality in their management systems, traded products and embrace continuous improvement.
- ASK Chemicals Group expects its suppliers to strive to implement the standards of occupational health and safety and responsible chemicals management by applying a health and safety management approach appropriate for the business and in line with the applicable legislation.
- Suppliers should comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, in order to preserve the health of employees, safeguard third parties and prevent accidents, injuries and work-related illnesses:
  - » This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures and
  - » adequate education and training of employees in health and safety issues.
- Suppliers are expected to make all reasonable efforts to protect the environment, and to minimize any negative environmental impact of its activities. As such, suppliers shall at least comply with all applicable environmental laws and regulations.
- Suppliers should manage resources sustainably by means such as reuse and recycling and minimize the consumption of natural resources such as water.
- Suppliers shall obtain, maintain and comply

with all environmental permits, licenses and registrations necessary by law for their operations and are held accountable with respect to their environmental impact.

### 5. Conflicts of Interest

Suppliers should avoid any interaction with ASK Chemicals Group employees or managing directors that may conflict or appear to conflict with that employee's or managing director's duty to act in the best interests of ASK Chemicals Group. Suppliers are obliged to disclose to ASK Chemicals all conflicts of interest or situations giving the appearance of a conflict of interest in their engagement with ASK Chemicals.

Suppliers must inform ASK Chemicals if an ASK Chemicals Group's employee or managing director or his/her immediate family member holds a material, financial or other interest in the supplier, holds a managerial position at the supplier, or works for the supplier.

### 6. Material Compliance & Conflict Minerals

- Suppliers shall guarantee that all materials delivered to ASK Chemicals Group comply with all applicable laws and regulations regarding the prohibition and restriction of substances, including hazardous substances.
- ASK Chemicals Group expects its suppliers to ensure that products or materials supplied to ASK Chemicals Group do not contain metals derived from minerals or their derivatives originating from conflict regions that directly or indirectly finance or benefit armed groups.

### 7. Data Protection and Intellectual Property Rights

- ASK Chemicals expects suppliers to comply with the applicable data protection laws.
- In particular, suppliers shall secure and use properly any confidential information made available by ASK Chemicals in order to ensure that the privacy rights of its employees, managing directors, and its business partners are safeguarded.
- ASK Chemicals expects its suppliers to honor third-party intellectual property rights and trade secrets and especially protect ASK Chemicals Group's own intellectual property rights and trade secrets.

### 8. Reporting Misconduct

- If a supplier becomes aware of a breach of any relevant law, regulation or this "Code of Conduct for Suppliers", either by its own employees or managing directors or ASK Chemicals Group employees or managing directors, the supplier shall inform ASK Chemicals as soon as possible.
- Suppliers can contact the Chief Compliance Officer of ASK Chemicals Group to report on misconduct.
- Suppliers are encouraged to also provide their stakeholders with a mechanism to raise concerns and are expected to protect their employees from retaliation.

This 'Code of Conduct for Suppliers' is not a substitute for, nor should it be considered to override applicable laws and regulations but sets the minimum standards of behavior that are to be followed by suppliers of ASK Chemicals Group.

ASK Chemicals Group explicitly reserves the right to conduct audits or assessments to ensure your compliance and will initiate appropriate actions together with you if there should be a reason for concern. This will also require your cooperation with any request of information to be made by ASK Chemicals Group. Moreover, ASK Chemicals Group also reserves the right to discontinue any relationship or contract for non-compliance to international standards, failure to correct violations, or displaying patterns of non-adherence to these standards.

By signing this acknowledgement, the supplier expresses its conformity with the policies and principles contained in the ASK Chemicals Group Code of Conduct for Suppliers and agrees to use its best efforts to ensure that its employees, directors, agents, representatives and sub-contractors are made aware and compliant with it. The supplier also agrees that it will make its own upstream and next-tier suppliers aware of its commitments hereunder, and encourage them to follow the same principles.

I, on behalf of my employer, hereby acknowledge and agree to adhere to the ASK Chemicals Group Code of Conduct for Suppliers and will ensure that all employees, directors, agents, representatives and sub-contractors are aware of such policies and principles and to abide by them.

Signature: \_\_\_\_\_

Authorized Signatory Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Company \_\_\_\_\_

Company Stamp/Seal: \_\_\_\_\_

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