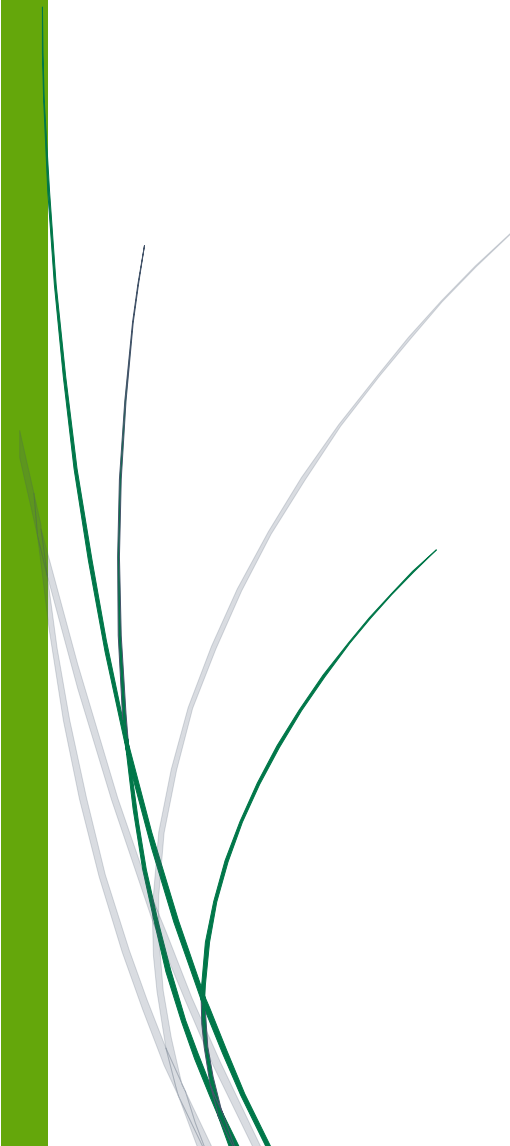




10/31/2023

# Corporate Policy

Code of Conduct



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## Message from Jens Ebinghaus

Welcome to the Code of Conduct of Cerdia Group (“Cerdia”). This document outlines the ethical principles and standards that guide our actions as employees and representatives of the company. By adhering to these guidelines, we contribute to a culture of integrity, safety, and professionalism.

At Cerdia, we deeply value our commitment to integrity and compliance, as it underpins our reputation as a trusted partner. We firmly believe that conducting business the right way is the only way to go. This means not only adhering to our Leadership Principles and the guidelines set forth in our Code of Conduct, but also embodying our core Values in our everyday actions.

This commitment to integrity and compliance is not just a set of rules; it's part of Cerdia's DNA. It is crucial for us to maintain our standing as a respected and trusted partner for both, our customers, and the people we work with. Our dedication to these principles ensures that we continue to be a reliable collaborator, fostering strong relationships built on trust and shared values.

The Code of Conduct, aligned with our Leadership Principles and our Corporate Values, embodies the standards we uphold for our behavior and choices. We value open dialogue, mutual accountability, and ongoing improvement. Our Leadership Principles foster an environment that empowers employees for their best performance.

Adhering to the Code of Conduct guarantees credible operations and collaboration, as trust hinges on integrity. This shared responsibility underscores the significance of every decision.

Kindly review the document, address queries within your team or with your supervisor, and help integrate compliance and integrity into our core. Your commitment is appreciated in embedding these values into our DNA. By aligning our actions with these principles, we contribute together to a culture of integrity and responsibility in Cerdia.

A handwritten signature in blue ink, appearing to read "Jens Ebinghaus".

**Jens Ebinghaus**  
Chief Executive Officer

October 2023

## 1. Introduction

Cerdia Code of Conduct serves as a compass for the ethical principles and standards of the company. By following the guidelines of this Code of Conduct, we contribute to a culture of integrity and professionalism, essential for Cerdia reputation as a trusted partner. Your commitment to these principles builds the solid basis for the long-term success of our company.

## 2. Purpose

This Code of Conduct sets out essential rules and provides guidance to ensure that all of us, including everyone acting on behalf of Cerdia, act with integrity. We are committed to conduct all aspects of our business in compliance with the highest legal and ethical standards and expects all employees and other persons acting on behalf of Cerdia to uphold this commitment.

## 3. Scope

This Code of Conduct applies to all directors, officers, and employees of Cerdia including but not limited to its independent third-party contractors (e.g., agents, distributors) and stakeholders who are associated with Cerdia and all its representatives.

The Code of Conduct is in effect at all times and in all locations where we operate.

## 4. Responsibilities

We are expected to:

- Comply with all applicable laws, regulations, and company policies,
- Treat all individuals with respect, regardless of their background or position,
- Uphold confidentiality, data privacy and protect intellectual property,
- Maintain a harassment-free and discrimination-free workplace.

## 5. Specific Policy

We are committed to the following fundamental business principles that guide our behavior:

**Safety:** Prioritizing the safety of our employees, communities, and the environment.

**Environmental Responsibility:** Minimizing our impact on the environment and promoting sustainability.

**Integrity:** Acting honestly, transparently, and ethically in all our interactions.

**Professionalism:** Maintaining the highest standards of conduct and performance.

From these fundamental principles we derive our Corporate Values and Leadership Principles.

### 5.1 Cerdia Corporate Values

Our Corporate Values are the foundation for our way of working. They define how we contribute to the business success and growth, and how we build and maintain a strong and sustainable relationship with our customers and stakeholders.

As a strong team we work closely together on a trustful basis to be able to improve continuously our processes and products and to deliver our targets and achieve success.



A strong **collaboration** requires a holistic view across the organization. It connects functions, sites, and teams and drives for diversity and inclusion.

Our focus on continuous **improvement** requires a high level of creativity, an open mindset, and the willingness to appreciate different perspectives. The drive to achieve top results while going the extra mile and always looking beyond the own “garden” is in our focus.

Our drive to **deliver** our tasks in time and at the highest quality level requires solid preparation and diligent execution with confidence. Our actions shall be aligned to clear targets and accountabilities, which requires the flexibility to develop multiple ways to succeed.

## 5.2 Cerdia Leadership Principles

Our Leadership Principles define how we lead our teams and act as leaders:

- We build trust and we walk the talk,
- We ensure transparent communication,
- We focus on solutions to thrive forward,
- We appreciate different perspectives,
- We foster teamwork to achieve our goals,
- We support and hold each other accountable.

## 5.3 Workplace Standards

At Cerdia, we always follow our General Working Conditions Policy and the following established Workplace Standards:

- We do not tolerate discrimination, harassment, or bullying of any kind.
- We follow health and safety protocols to ensure the well-being of ourselves and others.
- We handle hazardous materials in strict accordance with industry regulations.

## 5.4 Human Rights

We respect the human rights and dignity of people throughout our operations and global supply chain. We comply and expect our suppliers to comply with:

- Laws that promote safe working conditions and individual security,
- Laws prohibiting forced labor,
- Prohibitions on the employment of underage children,
- Prohibitions on human trafficking, and
- Laws that ensure freedom of association and the right to engage in collective bargaining.

As a company, we work to protect the rights of everyone working for and with Cerdia. That is why we:

- Pay fair wages,
- Support the rights of all our employees to work free from discrimination and unequal treatment,

- Value diversity and inclusion,
- Have meaningful grievance mechanisms in place.

### 5.5 Diversity, Inclusion and Equity

Promoting a culture of respect means treating each other well. We are strongly committed to equal opportunity in all employment decisions and promote a culture where everyone is treated with dignity and respect. This enables a good collaboration and establishes trust.

Our business success reflects the quality and skill of our people. We recognize that diversity is as important to our business as sustainability and customer satisfaction. Embracing the unique perspectives and capabilities of our employees helps us continue to catalyze innovation, maximize performance, and create business value and success.

A diverse workforce and an inclusive workplace are enablers of our vision to be a growing and innovative provider of sustainable high-quality products and services.

We are committed to championing inclusion, by strengthen the awareness around Diversity and Inclusion, combat unconscious bias and strive for a transparent compensation system to ensure pay equity. For more details have a look at our Diversity and Inclusion Policy.

#### 5.5.1 Harassment & Discrimination

Discrimination of any kind has no place in our culture and Cerdia is a company where everyone is welcome and valued. We prohibit any form of harassment or discrimination – no matter if it occurred in writing, verbally, physically, or visually such as photos or videos. We always support all our employees in case of an inappropriate or unethical treatment.

### 5.6 Health and Safety

At Cerdia, we recognize the unique challenges and responsibilities associated with operating in the chemical industry. The health and safety of our employees, communities, and the environment are paramount concerns.

We are committed to complying with all applicable health and safety regulations specific to our different locations. Our operations adhere to rigorous safety standards and protocols to minimize risks associated with chemical manufacturing, storage, handling, and transportation.

Our commitment to health and safety includes:

**Employee Training:** We provide comprehensive training to our employees to ensure they are knowledgeable about the safe handling of chemicals, emergency response procedures, and the proper use of personal protective equipment (PPE).

**Risk Assessment:** We conduct regular risk assessments to identify and mitigate potential hazards associated with our chemical processes. These assessments inform our safety procedures and preventive measures.

**Environmental Protection:** We take proactive steps to minimize the impact of our operations on the environment. This includes responsible waste disposal, pollution prevention, and compliance with environmental regulations.

**Emergency Response:** In the event of a chemical incident or emergency, we have established response plans and trained response teams to ensure a swift and effective response that prioritizes the safety of individuals and the environment.

**Continuous Improvement:** We are dedicated to continuously improving our safety measures by staying informed about the latest developments in chemical safety and adopting best practices.

By adhering to these health and safety regulations and our internal safety protocols, we aim to create a safe working environment for our employees and uphold our commitment to environmental responsibility in the chemical industry. For more details, have a look at our Integrated Management System (IMS) Policy.

## 5.7 Data Protection, Protection of Confidential Information, and Intellectual Property

### 5.7.1 Data Protection

For business purposes, we may need to collect private information from our employees and applicants, and our business partners. We respect and protect the personal and business data shared with us in due course of our business and handle this information according to our high ethical standards. We never disclose this information inappropriately, and we follow all laws governing privacy.



### 5.7.2 Confidential Information and Intellectual Property

Our business partners trust us to keep them protected. To maintain that trust, we safeguard our physical assets, intellectual property, and confidential information. We keep accurate financial records.

To protect our and our business partners' confidential business information, we:

- Never leave confidential information where others can see or access it,
- Access and store such information only on approved devices,
- Never discuss confidential matters in public,
- Ensure confidential information is always secure, even at your office desk,
- Dispose of all confidential information according to company policy,
- Do not share confidential information with any person who is not entitled for the receipt of such information.

Our responsibility to protect the confidential business information does not end when our employees leave our company who are legally obligated to protect confidential information after termination and/or expiration of their engagements by Cerdia.

### 5.8 Environmental Stewardship

We are committed to minimizing the environmental footprint of our operations and our products through the adoption of sustainable practices and continuous improvement in environmental performance. We are diligent in the proper handling, storage, and disposal of chemicals and waste. For more details, have a look at our Integrated Management System (IMS) Policy.

### 5.9 Conflict of Interest

We are transparent in our business practices. By avoiding conflicts of interest and disclosing potential areas of conflict, we demonstrate our commitment to our strong ethical culture. We never put our personal interests in conflict with those of Cerdia.

Since it is impossible to outline all potential conflicts of interest, we use good judgment in our day-to-day activities. The following are areas where conflicts of interest often arise:

- Outside employment, including self-employment, consulting activities or involvement in any start-up ventures or engaging in such a venture,
- Unpaid professional activities for any competitor or company in a similar business area or related entity that has a relationship with Cerdia,
- Close relative who works for any organization that has a relationship or competes with Cerdia in any way. Such relationships may result in conflicts of interest, potential bias or favoritism affect the ability operate effectively, judging fairly,
- Financial interest or investment (as owner, partner or stockholder) of 1% or greater of the total outstanding shares of any publicly traded company,
- Financial interest or investment (either directly or through an investment/venture fund where you have influence over investment decisions) in a private company/startup within a business area similar like Cerdia or related entity that has a relationship with Cerdia,
- Advisory board, Board of Directors or equivalent fiduciary roles for a residential, charitable, non-profit, religious, or social organization, or as part of your official job duties, or you wish to serve on a Board for any entity owned or controlled by you or your family.

If a conflict arises, we disclose it promptly to the appropriate parties.

### 5.10 Ethical Decision-Making

When we face ethical dilemmas, we seek guidance from supervisors or the designated ethics officer. We make decisions that align with our Corporate Values, Guiding Principles and long-term interests.

#### 5.10.1 Anti-Bribery & Corruption

We follow anti-corruption laws in all places we do business, around the world. We never offer or accept anything improper to secure our business. The consequences for giving or accepting a bribe can be severe for Cerdia and you as an individual.

To avoid bribery and corruption, we:

- Never offer or accept anything of value to influence a business decision,
- Follow all policies on gifts and entertainment.
- Take extra care when interacting with public officials,
- Know limits on gifts and things of value in all places we do business.

We conduct our activities in full compliance with the laws of the European Union, the UK Bribery Act, the United States Foreign Corrupt Practices Act (“FCPA”), all applicable anti-corruption laws of the countries where Cerdia operates its business, this Code of Conduct and our Corporate Policies.

Following the above, we are not permitted to give or offer anything of value, directly or indirectly, to any Government Official or any commercial party for the purpose of securing an improper advantage to retain or obtain business.

“Anything of value” should be broadly interpreted to include cash, gifts to family members, forgiveness of a debt, loans, personal favors, entertainment, meals and travel, political and charitable contributions, business opportunities and medical care, among other items. Simply put, bribes, kickbacks or similar payments are never permitted, whether made to a Government Official or to customers, investors, clients, or other private parties. Similarly, we may not solicit or accept such payments.

If confronted with a request or demand for an improper payment or other violation of this Anti-Bribery & Corruption rule, the request or demand must be immediately rejected and reported to the Group CFO. Similarly, if any employee knows or believes that an improper payment has been or will be made, the employee must also report such payment to the Group CFO. No adverse employment action will be taken against any personnel in retaliation for, honestly and in good faith, reporting a violation or suspected violation of anti-corruption laws or this Anti-Bribery & Corruption rule.

### 5.10.2 Gifting & Entertainment Rules

This Code of Conduct sets forth various rules relating to gifts, entertainment, travel, meals, lodging, and employment. We record all such expenditures accurately in the books and records of the legal entities of Cerdia.

#### 5.10.2.1 Gifts

As a general matter, the Cerdia competes for, and earns business, through the quality of its personnel, products, and services, not with gifts or lavish entertainment.

Using Cerdia’s funds or assets to provide gifts, gratuities, or favors to Government Officials or any individuals or entities in the private or public

sector that hold influence over the decisions of our business partners, with whom Cerdia is engaged or plans to engage in business, or that could otherwise benefit the Cerdia's commercial activities, is prohibited unless all of the following conditions are met:

- The gift does not involve cash or cash equivalent gifts (e.g., gift cards, store cards, or gambling chips),
- The gift is permitted under both local law and the guidelines of the recipient's employer,
- The gift is presented openly with complete transparency,
- The gift is properly recorded in the books and records of the relevant Cerdia entity,
- The gift is provided as a token of esteem, courtesy, or in return for hospitality and should comport with local custom, and
- The item costs less than €100.

Gifts that do not fall specifically within the above guidelines require advance consultation and approval by the Group CFO.

We are aware of the fact that the provision of gifts, as well as the reporting requirements apply even if we are not seeking reimbursement for the expenses (i.e., paying these expenses out of your own pocket does not avoid these requirements).

We do not accept or permit any member of our immediate families to accept any gifts, gratuities or other favors from any customer, supplier or other person doing or seeking to do business with Cerdia, other than items of nominal value. We return immediately any gifts that are not of nominal value and report it to our supervisors. If immediate return is not practical, we give them to Cerdia for charitable disposition.

### **5.10.2.2 *Meals, Entertainment, Travel and Lodging***

Common sense and moderation shall prevail in business entertainment and the payment of travel and lodging expenses engaged in on behalf of Cerdia. We provide business entertainment to someone doing business with Cerdia only if the entertainment is infrequent, modest, and intended to serve legitimate business goals.

Meals, entertainment, travel and lodging shall never be offered as a means of influencing another person's business decision. Each shall only be offered if it is appropriate, reasonable for promotional purposes, offered or accepted in the normal course of an existing business relationship, and if the primary subject of discussion or purpose of travel is business. The appropriateness of a particular type of entertainment, travel

and lodging of course, depends upon both the reasonableness of the expense and on the type of activity involved. This is determined based on whether the expenditure is sensible and proportionate to the nature of the individual involved. Adult entertainment is strictly prohibited.

Expenses for meals, entertainment, travel and lodging for Government Officials or any individuals or entities in the private or public sector that hold influence over the decisions of our business partners, with whom Cerdia is engaged or plans to engage in business, or that could otherwise benefit the Cerdia's commercial activities, may be incurred without prior approval by the Group CFO only if all of the following conditions are met:

- The expenses are bona fide and related to a legitimate business purpose and the events involved are attended by appropriate representatives of Cerdia,
- The cost of the meal, entertainment, travel, or lodging is less than €100 per person,
- The meal, entertainment, travel or lodging is permitted by the rules of the recipient's employer.

For all such expenses, the reimbursement request must identify the total number of all attendees and their names, employer, and titles. We support all expense reimbursements by receipts, and record expenses and approvals accurately and completely in the records of the relevant legal entity of Cerdia.

In all instances, we ensure that the recording of the expenditure associated with meals, lodging, travel, or entertainment clearly reflects the true purpose of the expenditure. We note that the provision of meals, entertainment, travel and lodging as well as the reporting requirements in this Section apply even if we are not seeking reimbursement for the expenses (i.e., paying these expenses out of your own pocket does not avoid these requirements).

When possible, meals, entertainment, travel and lodging payments should be made directly by the legal entity of Cerdia to the provider of the service and should not be paid directly as a reimbursement. Per diem allowances may not be paid to a Government Official or any other individual or entity in the private or public sector that hold influence over the decisions of our business partners, with whom Cerdia is engaged or plans to engage in business, or that could otherwise benefit the Cerdia's commercial activities for any reason.

Any meal, entertainment, travel, or lodging **expense greater than €100 per person**, and any expense at all that is incurred for meals, entertainment, travel, or lodging unrelated to a legitimate business purpose, we **pre-approved by the Group CFO**. For more details have a look at our Travel and Expenses Policy.

### ***5.10.2.3 Employment / Internships***

On occasion, Government Officials or Cerdia's business partners may request that Cerdia provides internships or employment to certain individuals. Offering internships or employment to Government Officials or our business partners may be viewed as providing an item of value. This Section sets forth guidance for handling such requests from Government Officials or the Cerdia's business partners. If a candidate is interviewed for an internship or employment within the ordinary course of filling a position, the Group CFO must be notified of the candidate's relationship to a Government Official or the business partner.

### ***5.10.2.4 Political Contributions & Donations***

We do not make political or charitable donations, whether in our own names or in the name of Cerdia, to obtain or retain business or to gain an improper business advantage.

Any political or charitable contributions by Cerdia must be permitted under the law, permissible pursuant to the terms of this Section, made to a bona fide charitable organization, and in the case of political contributions or charitable contributions connected to any Government Official or government entity made with the prior **approval of the Group CFO**. In certain instances where there is heightened risk of corruption, the Group CFO may require diligence to be conducted.

We notify the Group CFO if a Government Official solicits a political or charitable contribution in connection with any government action related to any of Cerdia's worldwide affiliates. Individual employees or agents may not make political contributions on behalf of Cerdia or of any of its worldwide affiliates.

### ***5.10.2.5 Relationship with Third Parties (Supply Chain Act)***

Anti-corruption laws prohibit indirect payments made through a third party, including giving anything of value to a third party while knowing that value will be given to a Government Official for an improper purpose.

Therefore, we avoid situations involving third parties that might lead to a violation of this Section.

Such precautions include, for third parties representing Cerdia before governmental entities,

- conducting an integrity due diligence review of a third party,
- inserting appropriate anti-corruption compliance provisions in the third party's written contract,
- requiring the third party to certify that it has not violated and will not violate this Code of Conduct and any applicable anti-corruption laws during the course of its business with Cerdia,
- monitoring the reasonableness and legitimacy of the services provided by and the compensation paid to the third party during the engagement.

When we retain third parties who will be representing Cerdia before governmental entities, we discuss the engagement with the Group CFO prior to hiring such third party. Any doubts regarding the scope of appropriate due diligence efforts in this regard shall be resolved by contacting the Group CFO. In addition, we are aware of potential red flags, once a third party is engaged.

We understand that red flags are certain actions or facts which shall alert us that there is a possibility of improper conduct by a third party. A red flag does not mean that something illegal has happened, but rather that further investigation is necessary. Red flags are highly fact-dependent, but some examples of red flags are:

- unusual or excessive payment requests, such as requests for over-invoicing, up-front payments, ill-defined or last-minute payments, success fees, unusual commissions, or mid-stream compensation payments,
- requests for payments to an account in a country other than where the third party is located or is working on behalf of Cerdia,
- requests for payment to another third party, to a numbered account, or in cash or other untraceable funds,
- requests for political or charitable contributions,
- the third party is related to a Government Official or has a close personal or business relationship with a Government Official,
- any refusal or hesitancy by the third party to disclose its owners, partners, or principals,
- the third party uses holding companies or other methods to obscure its ownership, without adequate business justification,
- the third party expresses a desire to keep his representation of Cerdia or the terms of his retention secret, or

- the third party has little experience in the industry but claims to “know the right people.”

If we have a reason to suspect that a third party is engaging in potentially improper conduct, we immediately report the case the Group CFO. Cerdia shall investigate and stop further payments to the third party if the suspicions are verified through the investigation.

### **5.11 Reporting Misconduct and Whistleblower Protection**

We encourage open communication and the reporting of all known or suspected violations of law, regulations, or company policy.

Cerdia Whistleblower Protection Policy provides us with the guidance on what, where and how to report known or suspected violations (“Disclosable Matters”). Cerdia declares that if the report is made honestly and in good faith, no adverse employment-related action will be taken against the whistleblower.

We may report any violations or concerns through established Whistleblowing channel at Cerdia’s Corporate Website where reports might be done anonymously or via optional channels such as our supervisors, upper-level supervisors, the HR Team, Legal & Compliance Counsel or a GLT member.

### **5.12 Compliance Procedures, Training and Communication**

As part of Cerdia’s ongoing commitment to compliance with our Code of Conduct, our employees receive a copy of this Code.

In addition, Cerdia offers periodic mandatory compliance training programs to educate the employees about the requirements and obligations of all for our business operations applicable laws and regulations, this Code of Conduct and Cerdia’s Policies. Open communication channels are available to address our questions and concerns. For more details have a look at our Training and Further Education Policy.

### **5.13 Enforcement**

We enforce our Code of Conduct strictly. Violations of the Code can lead to disciplinary action, including termination of employment or engagement.



### 5.14 Monitoring and Review

Cerdia will monitor compliance and periodically review and update this Code of Conduct.

### 5.15 Conclusion

Every day, we have the opportunity to contribute to Cerdia's culture of integrity, safety, and professionalism. By aligning our actions with this Code of Conduct and seeking to uphold the highest ethical standards, we collectively contribute to the long-term success and reputation of our company.

Thank you for your dedication to these principles and for your ongoing commitment to doing business the right way.

## 6. Internal and external References

### 6.1 Internal References

- General Working Conditions Policy
- Diversity and Inclusion Policy
- Integrated Management System Policy
- Travel and Expenses Policy
- Whistleblower Protection Policy
- Training and Further Education Policy

### 6.2 External References

- **United Nations – Human Rights:** [Universal Declaration of Human Rights | United Nations](#)

## 7. Governance

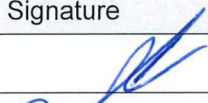
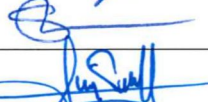



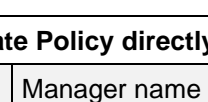
The Governance for this document sits with General Counsel of Cerdia in alignment with the Global Leadership Team (GLT).

## 8. Notice of Modification

Document the initial release and all change made in the following table:

Revisions				
Section	Changes	Reviewer	Rev.	Valid from
All	Initial version	Florian Hopfinger	00	01.03.2021
All	Template. New content was added	Alla Jörin	01	15.10.2023

## 9. Document Creation and Release

Responsibilities	Name	Function	Signature	Date
Prepared:	Alla Jörin	General Counsel		20.10.2023
Reviewed:	Susanne Felscher	HR		20.10.2023
	Maria Viloría	Sustainability		20.10.2023
Approved:	Marco Plattner	CFO		20.10.2023
	Jens Ebinghaus	CEO		20.10.2023
IMS conforming:	Maria Viloría	Sustainability		20.10.2023

## 10. Distribution List

Cerdia Managers to receive this Corporate Policy directly when released		
Unit	Function	Manager name
Basel	CEO	Jens Ebinghaus
Basel	CFO	Marco Plattner
Basel	VP Manufacturing	Holger Twrddy
Basel	Global Sales	Vincent Heckel
Basel	Global Procurement	Marc-Steffen Muche
Basel	Global R&D, Quality	Maria Viloría
Basel	Global HR Business Partner	Susanne Felscher
Freiburg – CPR	Site Director	Dieter Feldmann
Freiburg – CSG	Site Director	Kay Swanda
Brazil	Site Director	João Tunes
Serpukhov	Site Director	Boris Samsonov
Kingsport	Site Director	Arnaud Thermoz-Lorciere
Freiburg	HR Manager	Daniela Mutterer
Kingsport	HR Manager	Danielle Lucas
Santo André	HR Manager	Domingos Morais
Serpukhov	HR Manager	Svetlana Ryazanova

# Corporate Policy

## Code of Conduct



Effective from Oct 31, 2023

Department: Legal & Compliance

IMS Managers to cascade and archive the Corporate Policy when released		
Unit	IMS Manager	Phone
Basel	Maria Vilorio	+41 (0) 61 501 2547
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