



# CLR Code of Conduct

## 1. General Remarks

Trust and respect are prerequisites for a successful collaboration. Every employee must refrain from doing anything that runs counter to the interests of CLR or disrupts the order within the company, or that might disparage or damage the reputation of individual employees.

All employees must conduct themselves honestly, fairly, with decency and integrity in their work environment, avoid any conflict between private and business interests, and comply with all pertinent laws and regulations.

This Code of Conduct represents the minimum standards for all employees. The goal is to prevent situations that might call the integrity of our conduct into question. With our high ethical standards we strengthen the trusting relationship with our customers and other stakeholders. We do not tolerate any kind of corrupt behavior as we regard corruption as an obstacle to development and progress.

The Code of Conduct constitutes a binding ethical guideline and must be complied with at all times, just like the general applicable legal regulations and binding obligations. It applies to all employees, regardless of their position, remit, or personal aspects, such as age, gender, language, or culture. The Code of Conduct governs the way we deal with our primary stakeholder groups.

Every employee is required to know the basic relevant and binding obligations and in-house regulations concerning his or her remit. The respective managers must ensure that their staff members are familiar with this Code of Conduct and act in accordance with it.

We also expect our business partners to accept and respect the principles of our Code of Conduct.

## 2. Handling Information

It goes without saying that all employees must always communicate truthfully about CLR and its products. Information is highly valuable to both CLR and our stakeholders<sup>1</sup>. Therefore it is indispensable that information be handled carefully and responsibly. CLR complies with all data protection regulations and collects and processes personal data only if it has a legitimate interest or there is a clear legal basis for doing so. CLR has appointed a Data Protection Officer as control

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<sup>1</sup> E.g., employees, colleagues, suppliers, customers, representatives, neighbors, sovereign actors (government, authorities, etc.), media, and the public.



and contact person. It therefore also requires all employees to handle information and data with care.

Our customers' trust is based on us keeping business secrets. Therefore everyone is strictly obligated to observe absolute silence about all personal and business relationships, facilities, and affairs of CLR and its customers. Of course, this also applies to family members and for the time after the associate leaves CLR.

Moreover, confidential information about CLR or its products, customers, or other sensitive data must be protected from misuse. This specifically concerns information from, e.g., the Human Resources, EDP, Finance, or Research & Development Departments, which are especially sensitive. Confidential information must only be communicated to the intended recipient, and measures must be taken that prevent its unauthorized dissemination or publication. A confidentiality agreement or nondisclosure agreement may have to be concluded prior to the exchange of information, if necessary.

Business papers, files or documents of any kind may not be kept under private lock and key. Taking work documents out of the company requires the permission of the competent department manager or company management. Moreover, it is forbidden to give anyone who is not directly involved in the matter at hand access to business documents or to make or have made copies, photocopies, or excerpts for oneself or for third parties.

Disregarding the confidentiality obligation and carelessly disseminating sensitive information may be grounds for extraordinary termination and result in damage claims.

### **Communication with external stakeholders**

First point of contact for inquiries by media and the public is the director of Marketing and Corporate Communications. For inquiries by bodies of public administration, e.g. authorities, or inquiries by nongovernment organizations, the first point of contact is the company management or the pertinent representatives (e.g., data protection, quality, environment/sustainability, SA8000). In our dealings with government representatives or nongovernment organizations we communicate truthfully, transparently, and in compliance with the law.

When it comes to inquiries by external stakeholders, we must make sure on the one hand not to answer inquiries that are outside of our own purview and area of competence, and on the other that the legitimate interests of CLR are safeguarded. When in doubt, the respective supervisor or representative is available as a contact person. Routine inquiries in the course of day-to-day work are answered by every employee himself or herself.

### **Intellectual property**

We owe our success to an essential degree to products and innovative concepts for their application which we have developed as part of our own research and development activities. Where possible, we try to protect these results at the end of a long process via patents and copyrights. We therefore also respect and protect the intellectual property of others in the same way and respect in particular copyrights, patents, and trademark rights, as well as license contracts, e.g. for software.



### **3. Conduct at the Workplace**

Respect, mutual appreciation, honesty, and fairness in our dealings with one another are crucial for a successful collaboration. All employees of CLR are hired, trained on a regular basis, and advanced according to these principles.

We respect the personal dignity, privacy, and personal rights of every colleague and of our customers as well as of all other stakeholder groups.

#### **Ethical principles**

CLR does not tolerate discrimination or harassment at the workplace of any kind, be it due to gender, ethnic background, skin color, nationality, religion, sexual orientation, or disability, political stance, or union activity, nor with respect to any other personal characteristic. Every employee is obligated to refrain from any kind of discrimination and to make possible a respectful way of dealing with one another in a spirit of partnership. This includes respect for everyone's personality.

CLR does not tolerate any form of expression and conduct that is conducive to a hostile work environment or aims to ostracize colleagues. All employees must refrain from making statements that might be construed as inappropriate, harassing, or unlawful, regardless of whether or not the views expressed in these statements are correct. Any partisan political activity must be abstained from in the company and in dealing with all stakeholder groups.

CLR is absolutely committed to the observance of human rights, in particular the conventions of the International Labor Organization (ILO), the United Nations Conventions on the Rights of the Child and on the Elimination of all Forms of Discrimination as well as the General Declaration on Human Rights. As a socially responsible company we assume responsibility along the value chain. This commitment is evidenced by our certification according to the SA8000 standard, which we have been granted for many years. Every employee is called upon to point out relevant grievances or submit suggestions for improvement. Contact person is the respective supervisor, the Human Resources Department, or the SA8000 officer.

Exploitation of any kind, discrimination against people due to personal characteristics, and disregarding occupational safety regulations or employee rights are illegal and are not tolerated by CLR. We reject any kind of forced labor and child labor. We pledge to take all necessary and appropriate measures to ensure that our employees can freely exert the right to association and negotiation.

CLR pays its employees a salary in line with the collective bargaining agreement of the chemical industry, which is above the legally determined minimum wage. We do of course comply with the regulations concerning working hours and paid vacation in accordance with the applicable laws, industry standards, and collective bargaining agreements.

#### **Safety at work and health protection**



CLR is aware of the importance of the health and safety of its employees and stakeholder groups and has therefore established a comprehensive health and safety program. CLR pledges to provide a safe and hygienic work environment for the benefit of its employees and to take occupational health and safety measures to avoid accidents or adverse health effects.

Moreover, every employee is obligated to adhere to the respective safety regulations. Every individual is also required to consistently use the ergonomic aids and the personal protective equipment supplied, to provide assistance when an accident occurs, and to promptly notify his or her supervisor. Breaches of occupational safety regulations, dangerous working conditions, or other deficiencies must also be promptly communicated to the supervisor or occupational safety officers. Safety is a top priority for CLR, therefore we appreciate any suggestions for improvement.

### **Safety of our products**

Safety is also important with respect to our products: our customers and consumers expect us to always deliver products of impeccable quality that are safe to handle and apply.

With our product design and the monitoring systems that are part of our quality control we ensure that our products have no deficiencies or dangerous properties that might harm the consumers' health or our customers' property. Supporting measures in this respect are the careful selection of raw materials in terms of contaminants, the design of facilities, rooms, and processes regarding aspects of hygiene, microbiological safety, and undesirable foreign bodies, such as glass, metal, or hard plastics, as well as the selection of suitable packaging materials.

Our standard concerning the safety of our products is reflected in our certifications according to ISO 9001, EFfCI GMP, and AEO, which have been in place for many years. Needless to say, we comply with the legal requirements concerning the labeling, packaging, and transportation of our products.

Every employee is required to support the monitoring systems established by CLR and to promptly report events that might compromise product safety.

### **Environment & sustainability**

CLR recognizes the significance of sustainable development, and handling natural resources responsibly is an essential element of our activities. Sustainable business operations and responsible growth on the part of our company are central to our identity and our future goals. The use and application of sustainable raw materials and production methods is the basis of our new product development and an integral part of our products.

We bear responsibility for our products throughout their life cycle, from the selection of the raw materials to the selection of suppliers, the production and transportation conditions, all the way to their disposal.

All employees are required to protect natural resources and to ensure that their activities have as positive an impact as possible on the environment, for instance by saving energy, water, or



materials in their daily work, and in the planning and operation of buildings, facilities, machines and equipment, and by avoiding, reducing, and recycling waste.

We comply with local environmental laws and endeavor to continuously improve our contribution to the preservation and protection of the environment. Our self-image is reflected in the certification according to ISO 14001, which has been in place for many years, and in our support of numerous other initiatives and formats (e.g., Responsible Care, Chemie<sup>3</sup>, CDP, Ecovadis, SBTI).

All employees are called upon to report environmentally relevant grievances or to make suggestions for improvement. Contact persons are the respective supervisors or the environmental management officer.

### **Company property**

The assets and facilities, the business documents and the work tools and supplies, as well as other material and intellectual property of CLR must neither be misused for private purposes nor passed on to third parties since this would compromise the interests of CLR.

Many of the work tools and supplies used on a daily basis are the property of CLR, including, e.g., computers, office furniture, office supplies, software, copyrights, and many more. To protect our company property, all employees are obligated to handle this property with care and to prevent improper use, loss, and theft.

The company property of CLR must not be used without the proper authorization and be neither sold, lent, or given away, nor removed from the company premises. It is to be used solely for its intended purposes. Misuse, e.g. for personal, illegal, or other unauthorized purposes, is prohibited.

Under certain conditions company property may be used privately to a limited extent. The pertinent regulations are set forth in the respective company agreements and company guidelines (e.g., Data Protection Guidelines on the Agreement Concerning the Private Use of EDP and Communication Facilities).

All employees must make sure that customer property (as well as the property of our partners, suppliers, and other third parties) is protected, not impaired, and not damaged (cf. BA-V01).

### **Security in information technology**

Information technology has become essential in our day-to-day business, therefore effective measures ensuring data security are required. To prevent the theft of personal data, violation of copyrights, or general data loss, the regulations compiled in the Data Protection Guidelines are mandatory for all employees.

The EDP and communication facilities may be used in compliance with the guideline "Regulation of the private use of EDP and communication equipment in the CLR". Every employee is required to check emails and email attachments as well as any downloaded files before opening them, and to act in a way that actively supports the security of EDP and communication



facilities, thus protecting data from misuse. Furthermore, the use of sufficiently safe passwords and the exclusive use of software that is licensed or has been approved by the EDP Department must be ensured (cf. Data Protection Guidelines).

The respective supervisors, the colleagues in the EDP Department, and the data protection officer are available as contact persons for questions and suggestions.

The information technology safety measures also apply to work from a location other than the company premises (e.g., home office).

## **4. Comportment When Conducting Business**

Whenever we conduct business with outside parties, we act as employees of CLR. Therefore, every employee is obligated to always act in accordance with our corporate values, the applicable laws, and our Code of Conduct when he or she is in contact with our business partners. Contact person for the regulations stated below is the respective supervisor or the commercial & legal director / the SA8000 officer.

### **Competition and free market economy**

Even though it is unlikely that CLR will obtain a dominant market position due to its size, it is our business policy to promote fair competition. For us, this means not to denigrate or disparage competitors or their products and services. We do not make any attempts to manipulate tenders for the benefit of CLR or to engage in any other anticompetitive activities. The information we use for market research is always generally accessible, contains no confidential third-party data, and is based on ethically and legally impeccable sources.

CLR does not enter into any agreements on policies with competitors regarding prices, production volumes, offers, customer allocations, sale and purchase terms, the division of markets, or the boycott of other market participants. Every employee with relevant business contacts is obligated to strictly comply with the applicable antitrust laws.

In the context of its international business activities, CLR complies with the export control laws (e.g., embargoes, sanctions, approved simplification of procedures according to the trade facilitation program AEO) and the pertinent national and international legal regulations.



## **Conflicts of interest**

Private and business interests must be strictly separated! All employees are obligated to make conflicts of interest transparent so that CLR can deal with them in an appropriate manner.

To ensure that decisions concerning our day-to-day business are made impartially and in the interest of CLR – even if they conflict with personal interests – every employee is obligated to advise the Human Resources Department or the management of any sideline or professional consultancy activities, mandates, or significant financial interests in a commercial enterprise. The same applies to honorariums or other benefits for lectures, publications, or public appearances in connection with his or her professional activities at CLR. The acceptance of gainful secondary employment requires the prior approval of CLR!

## **Corruption and bribery**

CLR does not tolerate any form of corruption or bribery. Accepting or granting financial or other benefits for the purpose of obtaining competitive advantages is illegal.

In our business relationships, tradeoffs (gifts or personal advantages or advantages for relatives) must not be expected, provided, or granted. This equally applies to the contact with representatives of public authorities, office holders, politicians, or representatives of public institutions, and also if these should be requested (e.g., due to alleged cultural customs).

Prior to entering into a business relationship, a potential business partner must be fully and comprehensibly identified. If this is not possible, a business relationship cannot be established. Questionable money transfers that might support illegal activities (e.g., money laundering) are impermissible.

## **Gifts and invitations**

When accepting a gift or a benefit, the employee must check if the respective value is appropriate and make sure that it does not oblige him or her to offer a quid pro quo. Accepting gifts and other benefits is permissible if the following conditions are met:

The value of the gift or benefits granted is below a reference amount of 30 to 50 euros p.a. in the European Union. For other regions, a comparable ballpark figure applies that is adjusted to the respective local standards. When in doubt, the employee should consult with his or her supervisor. In the case of gifts and other benefits of a higher value that may not be declined in view of the business relationship, the employee must consult with the commercial & legal director on how to proceed.

Invitations to business meals may generally be accepted, but invitations that go beyond a regular business meal must be reported to the supervisor. For invitations to events without a predominantly business character (such as concert, theater, sport, and evening events, including seminars and conferences with a predominantly entertainment program) the following applies:





Generally speaking, every employee must check if his or her participation in the event is in line with customary business practices. This typically requires that the host is present, the participation is not frequently repeated, and the travel and accommodation costs are not assumed by the business partner extending the invitation.

Granting gifts and other benefits or invitations to events without a predominantly business character (entertainment events) are to certain degree compatible with standard business practices and a legitimate means to build and consolidate business relationships. However, under certain circumstances they may also call into question the professional independence of those involved. For these reasons, benefits or invitations to entertainment events may never be accepted, granted, or extended with the intention of gaining corrupt business advantages. This also applies to instances where there is a concern that such an intention or a conflict of interest could be assumed.

Any granting of benefits must be transparent and in accordance with the legal regulations. Invitations and gifts must only be handed over or delivered to the recipient's business address.

### **Contributions**

Donations and sponsorships are an expression of our social engagement. These contributions must only be awarded within the limits set by the respective laws and in agreement with the pertinent in-house regulations. Management checks all donations and sponsorships which have been applied for to ensure that they are in conformance with the values of CLR.

Political donations and contributions to political parties must be decided and disclosed by the management.

## **5. Contact Persons and Whistleblower System**

When they have questions or wish to make suggestions regarding this Code of Conduct, or if they have concerns regarding the conformity of the Code of Conduct in their work environment, all employees are called upon to openly approach the responsible persons at CLR. CLR is keenly interested in revealing any grievances and violations, and in eliminating any uncertainties. In no event must employees of CLR fear that they will suffer disadvantages as a consequence – this would be illegal.

Contact persons are named at various instances in the Code of Conduct. If an employee is still uncertain as to who the proper contact person is, or if he or she prefers to report on a matter anonymously, the whistleblower system and the complaint management process at CLR are options in addition to the direct supervisor.





## 6. Final Provisions

Mandatory legal regulations, binding orders by public authorities, and provisions of the collective bargaining agreements for the chemical industry take precedence over the provisions of this Code of Conduct.

Anyone violating this Code of Conduct or the order and safety of the company may be held accountable in accordance with the legal regulations.

This Code of Conduct shall come into force effective September 1, 2023. It is handed out to every employee and every person to be hired when joining CLR. Subsequently, pertinent instruction will be provided on a yearly basis. The Code of Conduct is continuously examined and updated if necessary. It is revised every three years at the latest.

Berlin, September 05, 2024

Chemisches Laboratorium  
Dr. Kurt Richter GmbH

A handwritten signature in blue ink, appearing to read 'Borchert', is written over a horizontal line.

Dr. Stefan Borchert  
Managing Director