

## Code of Conduct

Economic success and corporate responsibility cannot be separated. Our understanding of entrepreneurial behavior is characterized by a respectful, fair and responsible approach to our employees, our business partners, as well as our society and the environment. We see the principles set out in our code of conduct as a common guideline for our decisions and actions. We are convinced that the sustainable and successful development of our company depends, among other things, on the consistent implementation of this "Code of Conduct".

The principles set out herein apply equally to all ARCOLOR employees and managers.

1 "Employee" is used to mean all employees, irrespective of gender. It covers all employed persons, including those employed as part of contract staffing and board members.

2 "Managers" means "employees" – as defined above – in a management function. Due to their special role, this Code of Conduct in some places explicitly highlights their responsibility for the implementation of our Code of Conduct.

## **Preamble**

ARCOLOR is a global printing ink manufacturer and a global leader in water-based decor printing inks.

Our customers are the hub of our activities. With our customers, we maintain reliable and trustworthy partnerships for our mutual benefit; we see their long-term satisfaction as a prerequisite for our success. Our employees use their many years of experience and extensive expertise every day to achieve this. In doing so, they align their actions with our code of conduct.

We expect all our managers to assume their special responsibility and act as a role model towards one another, as well as toward our company, our employees and business partners. This is particularly evident in the fact that they actively position themselves in accordance with our code of conduct and support their employees in its implementation, especially in the prevention of illegal behavior.

We have been guided by our corporate values in defining our code of conduct. Respect for human dignity, health and safety at work, responsible and integrated conduct in business transactions and the conscientious and careful use of company property and scarce resources are of central importance to this.

These principles apply across national borders and provide a central guideline for each of our employees in their daily work – even in the way they interact with one another. We therefore work to ensure that our business partners, in particular our suppliers and distribution partners, also comply with our code of conduct. The straightforward implementation of our principles ensures transparency and trust for our customers and business partners. In this way, we secure and promote our success, protect employees and the company from harm, and at the same time make an important contribution to social and business development.

## **General Code of Conduct**

### Compliance with applicable laws

We align our business activities with applicable local and international laws, as well as internal regulations and guidelines. We expect our employees – especially our managers – to know and comply with the laws, regulations and internal company rules relevant to their area of responsibility. We support them by providing appropriate training. In order to support our employees in their daily work, ARCOLOR has adopted various guidelines. Every employee is obliged to comply with these regulations.

### Equal opportunities and the prohibition of discrimination

We are opposed to any form of discrimination. We respect human dignity. Our employees are our most important factor for success. Above all, our strength lies in the diversity of our employees, which is also part of our forward-looking corporate culture. This is characterized by different mindsets, respect and openness. We therefore expect all individuals to treat one another with dignity and respect. We use all the means available to us to prohibit discrimination on the grounds of ethnic origin, gender, conviction, religion, age, disability or sexual identity.

## **Dealing with business partners and third parties**

### Competition and antitrust law

We are committed to free and fair competition. In business transactions, we act with integrity and responsibility. We are convinced that we can be successful in the face of competition thanks to our high-quality specialty products and the comprehensive expertise of our employees. We strongly reject the influence of free competition through concerted practices and resolutely oppose any kind of disregard for these rules.

### Conflicts of interest

We are committed to making business decisions in the interest of ARCOLOR at all times. We are aware of the possibility of conflicts of interest; we do not allow any actions to the detriment of our company. For example, a conflict of interest may arise from involvement in a competitor company, while other conflicts of interest may arise from authorized or unauthorized secondary activities. The receipt of gifts or rebates granted by suppliers, dealers or customers for personal purposes may also create a conflict of interest and significantly affect unbiased business decision-making.

Conflicts of interest may also arise from business relations with related parties, which is why we always take care to adhere to the "at arm's length" principle in these cases.

### Corruption and benefits

We are explicitly opposed to any form of corruption. Business decisions must on no account be influenced by the acceptance or granting of an advantage. We achieve competitive advantages only through entrepreneurial action and through the quality of our products and services. Benefits and hospitality may only be accepted and granted within the framework of our specific internal guidelines. Donations and sponsorship are assessed on a case-by-case basis and, if necessary, subjected to examination as part of approval. Acting in accordance with these guidelines promotes transparency and trust within ARCOLOR and toward our business partners.

### **Handling company property, data and know-how**

#### Company property

We protect the property and assets of our company. We show our respect by treating the property and assets of ARCOLOR responsibly and as carefully as if they were our own. In this way, we secure value retention, promote value enhancement and protect the capital of our company and that of our investors.

#### Data protection and data security

We want to ensure the highest level of protection and security for the data of our employees and those of our customers and business partners within the framework of legal requirements. This is an important building block to strengthen confidence in our business. In particular, personal data are therefore only collected, processed or used by us if needed for a specific, defined and permitted purpose. The transfer of data, the prevention of access to data and the use of data are also the subject of special protection.

All employees are obliged to act in accordance with the relevant data protection laws and always observe the personal rights of others.

#### Know-how and insider knowledge

We need the valuable expert knowledge of our employees to promote our success. This knowledge may therefore only be used for the purposes of ARCOLOR, may not be made available to third parties and is subject to industrial secrecy during and after termination of employment. Such knowledge may also not be misused in the sense of the current rules on insider trading.

## **People and the environment**

### Rejection of child labor

We strongly reject child labor. Children need special protection, which is why we are particularly concerned about this. At ARCOLOR, employment of persons under the age of 15 or younger than the legal minimum age is strictly prohibited.

### Rejection of forced labor

We distance ourselves from all forms of forced labor and the exploitation of workers, especially children and young people. We strongly reject these. Our employees perform their work on the basis of voluntary decision-making and not on the basis of threats of direct or indirect violence or intimidation.

### Fair working conditions and health protection

We observe the relevant regulations for ensuring fair working conditions and protecting the health of our employees. The health and safety of our employees is of special concern to us. Therefore, we ensure a healthy and risk-free working environment by complying with laws and regulations as well as by observing relevant design principles. In particular, our managers must ensure that appropriate protective measures are introduced and implemented to ensure health and safety in the workplace.

### Environmental protection

We consider environmental and climate protection to be an important element in our corporate activities. As a globally active company, considerate interaction with the environment and careful use of the limited resources available are an integral part of our corporate responsibility. Therefore, we use our influence to ensure optimum and responsible conditions in connection with the procurement, production, distribution and use of our products. Our employees share our beliefs and behave accordingly.