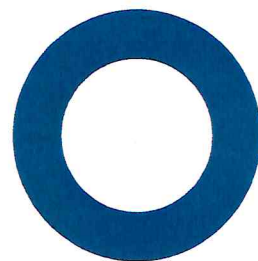


Corporate Compliance Policy

OQEMA Group
Code of Conduct



(1) Our goal - trust through honest and regulated business management

Compliance with the law and regulations is a fundamental principle of economically responsible action for us. This also applies if this involves economic disadvantages or difficulties for the company or individual persons. The OQEMA Group is active on a pan-European scale. The activities in the European area are subject to various country-specific and international legal regulations.

This Code of Conduct is to help all employees and managers to behave correctly, towards colleagues, superiors, customers and service providers and also towards the public.

The aim is to promote the integrity of the employees and thus the OQEMA Group as a whole.

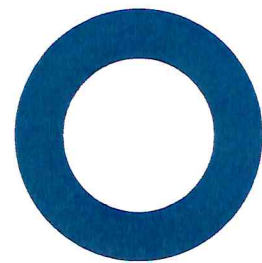
The following Code of Conduct lists and explains the behavioural requirements for achieving this goal. The task is to prevent situations which could question the honesty and legal conformity of our conduct and the trust in our company.

(2) Binding requirements for all employees

This goal can only be achieved if everyone in the company is involved and feels attracted by it.

Our employees must observe the relevant laws and official regulations in their working environment as well as our internal instructions and guidelines. They are asked to behave honestly and fairly in their working environment and to avoid any conflicts between private and business interests of the company, its partners or the interests of our customers.

Managers have a role model function. They are responsible for their own conduct and the conduct of the employees in their area of responsibility as well as for the proper observance of all procedures laid down there to avoid reputational and legal risks.



(3) Whistleblowing procedure

All employees are strongly encouraged to contact the Compliance Officer, the Compliance Office or their supervisor if they discover that someone is behaving improperly or dishonestly. This can prevent small problems from becoming big ones. No employee who makes a report with good intentions needs to fear any disadvantages - even if the report turns out to be unfounded. Notifications can also be made anonymously.

For this purpose OQEMA has installed an electronic whistleblowing system which is accessible to all employees. The access data are attached in Annex 1.

(4) Respectful treatment of each other, development according to performance and potential, non-discrimination

Treating each other with respect is a basis for our success. We are prepared to learn from our mistakes and appreciate the frank word. The culture of equal opportunities and mutual trust, openness and appreciation is actively lived. Equal opportunities are encouraged. The main criteria for the development of employees are performance and potential.

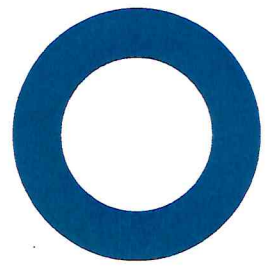
OQEMA does not tolerate any discrimination or harassment whatsoever, whether on racist grounds, on the basis of origin, age, disability, gender, political or trade union activity, religion/belief or sexual orientation.

(5) Human rights

We respect human rights in accordance with Article 1 of the German Constitution in which human rights are cited as forming the basis of any human society and as fundamental to peace and justice in the world, and in accordance with the UNO human rights declarations and conventions.

(6) Labour rights

Employee rights form an important part of the OQEMA corporate culture. These also include the right to reasonable remuneration. Pay and other benefits correspond to at least the respective national and local legal standards and the level of the national economic sectors or industries.



We reject child and forced labour in any shape or form. In accordance with the ILO core labour standards, we attach importance to fair working conditions and a safe working environment. We also respect and support the right of our employees to assemble in freedom as well as collective bargaining.

(7) Health and labour protection

Processes, facilities and equipment must comply with the applicable legal and internal regulations of occupational safety, health, fire and environmental protection. Occupational safety has top priority for us. Our warehouses and plants are planned and operated in strict observance of the safety regulations. The health and safety of our employees rank equally as corporate objectives alongside product quality and business success.

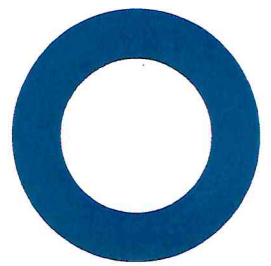
Therefore, occupational health and safety form an integral part of all operational processes. The consumption of alcohol during working hours is prohibited. Moderate consumption of alcohol is permitted within the normal social framework, for example at customer events, business dinners and festive or social occasions (Christmas or birthday celebrations). The possession or trade of drugs is prohibited.

Every employee is jointly responsible for health and safety in his or her working environment and must comply with the relevant regulations. Every manager is obliged to instruct and support his or her employees in the observance of this responsibility.

(8) Protection of personal data and confidential information

We pay strict attention to compliance with the regulations on the protection of personal data. Personal data may be processed if necessary and legally permissible. The rights of information and correction of the data subjects as well as, if applicable, to objection, blocking and deletion must be respected.

Each of our employees is obliged to keep business and company secrets secret, which have been entrusted to him or which come along his/her way in his/her business activities. Confidential information and documents about OQEMA, employees, customers and other business partners must be protected in a suitable manner from the view of third parties and colleagues who are not involved.



Access to the Internet, worldwide electronic information exchange and electronic business transactions are key prerequisites for the success of the business as one whole. The advantages of electronic communication are associated with risks of data security. Effective precautions against these risks are an important part of the IT management. This precaution and the appropriate handling of confidential data is also the task and responsibility of each individual employee.

... The IT security and data protection guidelines as well as the contractual regulations on the duty of confidentiality is explicitly pointed out.

(9) Communication with customers, business partners, the public and authorities

We attach great importance to truthful reporting. All company announcements and reports must be complete, fair, accurate, prompt and understandable. This applies in particular to information and advertising material about our products and services.

Information to customers, other business partners or the public about OQEMA Group, subsidiaries, products, customers or other business partners may only be provided through authorised employees.

OQEMA cooperates with all relevant public institutions and supervisory authorities. Any related communication may only be made through designated employees or the management.

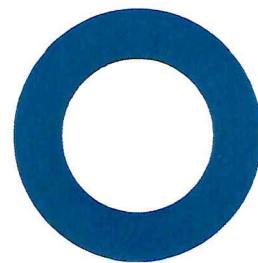
(10) Social networks

Anyone who expresses his or her opinion in a public discussion or in social networks on topics that affect the OQEMA group should make it clear that he or she is acting as a private individual and with OQEMA's interests in mind.

Statements made in e-mails or social networks can be made informally and spontaneously, but they remain recorded and visible to the recipient or the Internet public for a long time.

(11) Customers complaints

Customer complaints provide valuable information about improvement opportunities and they are an opportunity to consolidate or regain customer relationships.



OQEMA ensures that all significant customer complaints are dealt with promptly in a fair and comprehensible manner.

(12) No conflicts of interest with clients and other business partners

We strive for sustainable business relationships with our customers and other business partners for mutual benefit. Every employee must ensure that the interests of our customers and other business partners are taken into account in a fair manner.

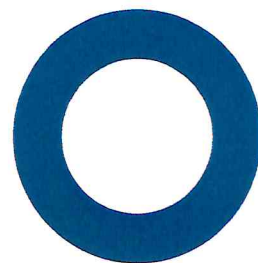
The interests of customers or other business partners mustn't be prioritised as a disadvantage for other customers. We protect the confidentiality of customer information entrusted to us and ensure that our services for one customer do not harm the interests of other customers.

(13) Personal conflicts of interest

If employees get into conflicts between their personal interests and their professional duties or the interests of OQEMA, our customers or other business partners, this can damage the reputation of the employees and the company as a whole.

Employees should therefore avoid these situations for their own interests and in the interests of the company. The following is applicable:

- Paid or unpaid secondary activities, active participation in other companies, membership in the institutions of other companies and the assumption of honorary positions in business associations or in public life require the prior written consent of the management. The same applies to lectures and publications that affect the interests of the company. Approval is granted if there are no conflicting interests of the company. The aforementioned consent requirement does not apply to the acceptance of voluntary activities in the charitable, sports and confessional fields which do not harm the essential interests of the company.
- No activity for a company, whether independent, dependent or otherwise, which is in direct or indirect competition with OQEMA or is affiliated with a competing company. No establishment or acquisition of such a company, no participation in it and no development of



comparable activities. This also applies to companies affiliated with OQEMA.

- The acquisition of publicly traded shares in companies is exempt from the above prohibition, provided that this acquisition does not grant a significant influence on the company.
- No financial interests in companies that may be affected by professional decisions of the employee or the company (exception: acquisition of publicly traded shares of companies, provided that this acquisition does not grant a significant influence on the business activities of OQEMA).
- If known, placing contracts to relatives, life partners or other close persons of employees must be reported in advance to the supervisor and the Compliance Officer. This also applies to transactions with companies in which relatives are directly or indirectly involved.
- Hiring relatives is subject to approval. Direct reporting lines between children, parents, spouses or life partners must be avoided.
- No assumption of entrepreneurially responsible positions (e.g. board member, management, executive board, supervisory board, advisory board) with customers or other business partners without the prior consent of the management.

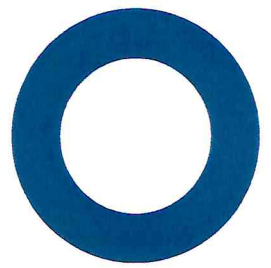
In case of doubt, the Compliance Officer must be consulted. The perception of third parties is decisive. Even the appearance of a personal conflict of interest is damaging.

14) Gifts, business meals and events

Gifts, business meals and events for information, representation or entertainment purposes can be a legitimate means of establishing and supporting business relationships.

However, they must never be used to obtain unfair business advantage and must not be of such a magnitude or nature as to compromise the professional independence and judgement of the parties involved.

The details are set out in the "Anti-Corruption Directive"



(15) Donations and sponsoring

We see ourselves as an active member of society and we are therefore involved in various ways. We give donations as grants on a voluntary basis, without expecting anything in return. Accordingly, they may not be used to obtain unfair advantages from business partners.

As a matter of principle, we do not make donations to political parties, to individuals or to organisations whose objectives contradict the principles of a democratic legal system or the objectives of our corporate culture. All donations are made transparently, the identity of the recipient and the purpose of the donation are known and the purpose is legally justifiable. With our sponsoring activities we support education, science, culture and sports.

Decisions on donations and sponsoring are made by the Board of Directors or by the management.

(16) No toleration of corruption, special caution with public officials

OQEMA does not tolerate any form of bribery or corruptibility, acceptance or granting of advantages.

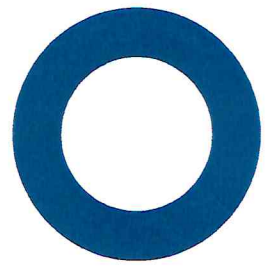
Anyone who does not respect the rules for gifts and invitations in accordance with the internal guidelines runs the risk of being prosecuted for corruption offences. Even the promise or demand of unfair advantages can be punishable by law.

Giving or accepting advantages to public officials may be punishable as an acceptance or granting of advantages simply because it is made in the course of the performance of the service. It is not necessary for public officials to be unfairly influenced. Any person charged with the performance of public duties may be a public official, not only civil servants and public employees.

Therefore, the rules of the employer must always be observed when inviting and making gifts to public officials.

The Anti-Corruption Directive in its current version is explicitly pointed out.

(17) Prevention of money laundering and terrorist financing



OQEMA has established risk-appropriate precautionary measures to prevent money laundering and the financing of international terrorism in accordance with the legal provisions and requirements of the supervisory authorities.

(18) Export control regulations and embargoes

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We strictly observe all export control regulations and will not tolerate any violation of applicable embargo or sanction regulations.

(19) Protection of competition

We are committed to free and fair competition. OQEMA does not participate in illegal agreements and practices restricting competition, in particular agreements on prices, conditions and market sharing with competitors. Before employees deviate from standard contracts or the procedures provided for in cooperation agreements, they clarify with the management that no unlawful effects on competition law are involved.

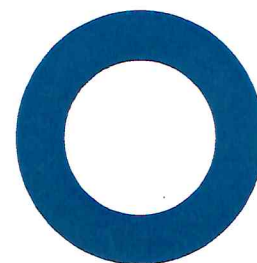
In contacts with competitors and business partners, employees do not discuss internal matters, such as prices and terms of sale or financing, costs, market surveys, organisational procedures or other confidential information from which competitors or business partners could gain a competitive advantage, without prior clarification with the Compliance Officer or management.

The current version of the Directive on Compliance with Competition Rules is explicitly pointed out.

(20) Protection of company assets and natural resources

Responsible handling of company property, i.e. products, working materials and intellectual property, is obvious for us. Company property and assets must be protected against misuse, loss or theft. Our company's assets and equipment, business documents and working materials may not be stolen or misused for private purposes or given to third parties.

In their work, employees should endeavour to protect natural resources and ensure that the company's business activities have the least possible impact on the environment through material savings, energy-saving planning and the



reduction and recycling of waste. Every employee should consider environmental and social criteria in addition to economic considerations when selecting suppliers, procuring advertising materials or other external services.

(21) Environmental protection

Sustainability is also an important corporate goal for us when it comes to environmental protection. Environmental legislation sets binding standards for this, which we respect at least. Every employee is responsible for treating natural resources with care and he or she should contribute to the protection of the environment and climate through his or her individual behaviour.

(22) Consequences in the event of infringements

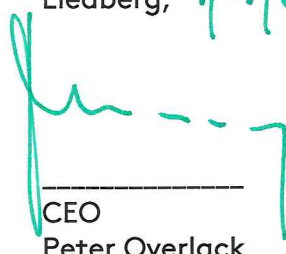
Abuses of the rules of this Code of Conduct may result in considerable loss of reputation and legal disadvantages for the related employees, their colleagues and OQEMA or our business partners. It can even cause fines, criminal proceedings or restrictions on official permits. Violations that constitute a breach of obligations under employment contracts may lead to action under employment law.

(23) Consultants and business partners

We expect our external partners to also comply with the principles for in compliance and fair conduct as set out in this Code of Conduct.

OQEMA AG

Liedberg, 9/9/22



CEO
Peter Overlack



Co-CEO
Patrick Barthels



CFO
Hartmut Kunz



COO
Philipp Junge



Annex 1

electronic whistleblowing system

Access data:

Every employee has the option of forwarding information via the e-mail address compliance@oqema.com .

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