



# Code of Conduct





#### Table of contents

Human rights	2 - 3
Occupational and social standards	2 - 3
Environmental protection, health and safety	4
Business ethics	5
Fair competition	6
Data protection	7
Implementation and liability	8
Contact	9

#### Foreword

#### Dear Employees,

The trust of our customers, business partners and the general public is of crucial importance for the success and reputation of the Heubach Group.

For this reason, it goes without saying that compliance with company-specific and legal rules for the protection of human rights, the environment and the prevention of corruption have top priority.

This code of conduct is intended to serve as a guide for all of us to deal honestly, fairly and safely with one another and with our external business partners. It is a binding set of rules that is intended to give us orientation for day-to-day activities. Of course, it does not describe every situation that you may be confronted with in the course of your work at Heubach, but it is intended to help you identify the right course of action.

The regulations of the Code of Conduct should not only be taken note of, but actively implemented and lived. Anyone who deliberately violates the Code of Conduct damages the company's reputation. We therefore ask you to pay attention to compliance with the Code of Conduct in your work environment and to address violations openly.

We will provide you with the support you need to do so and are always available for any questions or suggestions you might have. Thank you very much for your dedication!

With kind regards

Birgit Genn  
Managing Director of Heubach GmbH



**Human rights**



*"Heubach acts in accordance with internationally recognized human rights and occupational standards"*

We consider it a matter of course to uphold and promote human rights in the context of our everyday business activities as well as during the recruitment, employment, education and training of our employees. We respect the inherent dignity and personal rights of our employees and business partners and act in accordance with internationally recognized standards such as the Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights.

**Working conditions**

We recognize the right of all employees to appropriate remuneration and act in accordance with the respective national and local legal standards at a minimum. In compliance with the regulations stipulated in the collective agreement of the German Mining, Chemical and Energy Industrial Union (IG BCE) we provide our employees with above-average benefits for salary, vacation and fringe benefits.

**Child and forced labor**

Our company naturally does not employ any persons against their will, that is, on the basis of a law, an administrative decision or a court ruling. Birth dates are checked during the recruitment process, and the minimum employment age set out in the respective regional laws is taken into account and complied with. We further adhere to the respective valid national agreements and laws regarding working hours and paid leave.



**Conflict minerals**

In reference to section 1502 of the DODD-FRANK WALL STREET REFORM AND CONSUMER PROTECTION ACT, Heubach confirms that our products do not contain any of what are known as "conflict minerals," including coltan, cassiterite, gold or wolframite (Additional information: cobalt, see below) originating in the Democratic Republic of the Congo or neighboring countries. To this end, our suppliers must also officially confirm their compliance with the conflict mineral provisions specified in the Dodd-Frank Act. If it transpires that any raw materials do contain conflict minerals in violation of the concluded agreement, Heubach will immediately cease their purchase.

**Cobalt**

Heubach uses cobalt to manufacture high-performance inorganic pigments. In order to address the known risks relating to the extraction of cobalt, we have made a commitment to only use cobalt from suppliers who undergo audits in accordance with the Responsible Minerals Assurance Process of Cobalt (RMAP).

This process was developed jointly by the Responsible Minerals Initiative (RMI) and the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Export (CCCIMC). It is based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas. In addition, the process takes into account the global standards of the U.S. DODD-FRANK WALL STREET REFORM AND CONSUMER PROTECTION ACT.

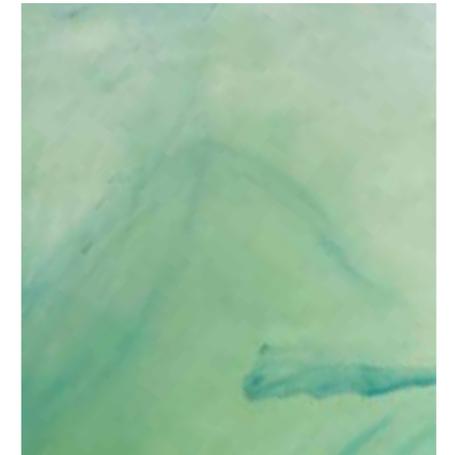
**Discrimination and equal opportunity**

As an internationally active company, we are committed to excluding any form of discrimination based on gender, racial or ethnic origin, religion, belief, disability, age, sexual identity or other personal characteristics during the recruitment, employment, promotion and development of our employees.

We consider it a matter of course to promote equal opportunities as well as fair, task-oriented and trusting cooperation within and outside of the company.

**Right to organize and bargain collectively**

Heubach respects the right of employees to establish, act on behalf of or join organizations or associations dedicated to the purpose of protecting or promoting the interests of workers. These include collective bargaining, coalitions as well as other assemblies. It should be noted here that national standards regarding organizing and collective bargaining will be upheld.





*“Heubach works actively to ensure safety as well as environmental and health protection”*



#### Environmental and health protection

Resource efficiency and sustainable protection of climate, the environment and health take top priority for us. We uphold all laws, as well as our own additional provisions, in order to protect the health of employees and consumers and minimize environmental impacts.

Furthermore, we continually improve the already high environmental compatibility of our products and processes and ensure that they are monitored, inspected and assessed by means of a comprehensive HSE and quality management system. Our strict standards for health and environmental protection are implemented consistently at all of our locations. Every employee is obliged to promote the prevention and minimization of emissions and waste as well as to make sparing use of natural resources such as energy, raw materials, water and soil.

#### Safety

Establishing and maintaining safe working conditions is of great importance for Heubach. For this reason, all employees are required to comply with the adopted occupational safety regulations contained in our safety agreement. Management has the particular responsibility of providing their employees with in-depth instruction and supporting them in this regard.

In addition, our health and safety committee (ASA) regularly holds discussions on important matters relating to occupational safety and accident prevention in order to ensure the safe and uninterrupted operation of the company. Among other things, this includes safety inspections of company premises as well as reviews of implemented measures. The results are documented in health and safety committee records which are accessible to all employees.



#### Business ethics

We ensure that legislation and the prohibition of corruption and bribery are continually monitored and maintained by means of binding rules for all employees. This means that no gifts may be accepted or offered in the course of interactions with public officials or business partners which are intended to influence business decisions to one's own advantage or even simply imply such intent. In training courses, managers and employees receive the information they need to recognize critical situations and react accordingly. Violations of these rules are monitored and prosecuted according to their type and scope.

Heubach employees may only accept or offer gifts in moderation, and these must be of appropriate value. These include, for example, small promotional gifts or invitations to events which are in line with customary business practices and can be considered a courtesy.

Offering, requesting or accepting cash or gifts that can be regarded as cash equivalents is not permitted under any conditions.



*“Heubach denounces corruption and bribery”*





*"Heubach deals fairly with business partners and competitors"*

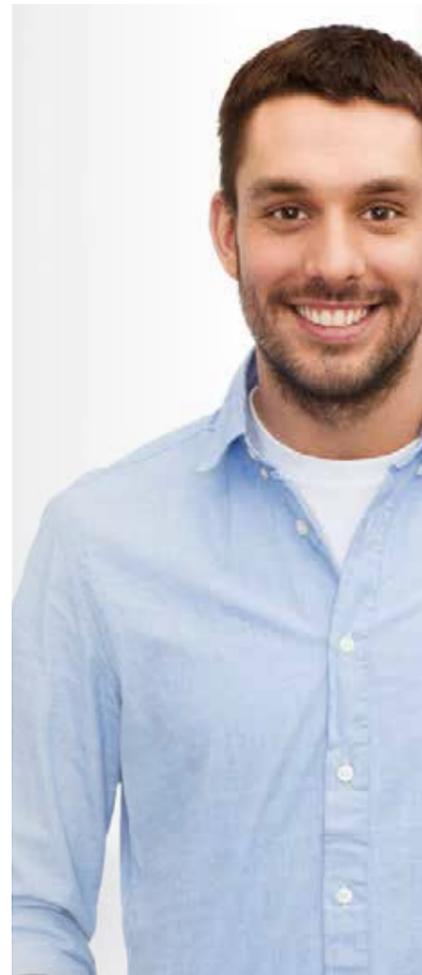


**Fair competition**

We respect fair competition and observe the laws protecting and promoting competition. It is therefore forbidden to enter into agreements with competitors ("horizontal agreements"), suppliers ("vertical agreements"), distributors and sales companies regarding prices, market sharing, capacities or investments which have as their object or effect the prevention, restriction or distortion of competition. This also applies to coordinated practices or informal discussions.

Any direct or indirect exchange of information with competitors is further prohibited. This provision applies in particular to information in the context of customer data, pricing, strategies, sales, cost structures, market shares or similarly sensitive data.

To the extent that Heubach possesses a dominant market position, for example with regard to a particular product, this position is not abused or exploited to the company's advantage. No disproportionate sales and purchase prices or conditions are enforced, nor are deliveries refused, sales partners treated unequally or tie-in transactions negotiated.



**Data protection**

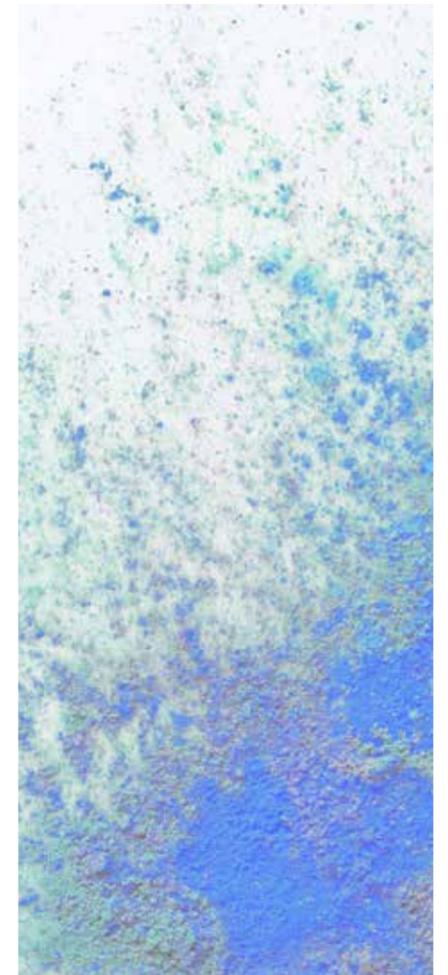
Heubach ensures the greatest care and confidentiality in its handling of personal data (e.g. name, address, contact details, data of birth or state of health) belonging to business partners, employees or other third parties, and complies with applicable laws and regulations. Employees entrusted with the collection, storage, processing or transfer of personal data receive support and advice at all times from our data protection officer.



*"Heubach ensures that personal data and confidential information are protected"*

**Confidentiality**

Expert knowledge, patents and inventions are of particular significance to Heubach's long-term success. For this reason, it is mandatory that confidential information of any kind remains undisclosed and is protected against unauthorized access. Furthermore, knowledge regarding business secrets and confidential information must never be used for personal advantage or the advantage of third parties (insider trading).





### Implementation and liability

The Code of Conduct is a company policy which brings together statutory provisions and company regulations and forms a key component of our corporate culture. It is distributed in the course of hiring new employees and is also available on Heubach's intranet. Management is further obliged to integrate the Code of Conduct into training sessions and staff appraisals as well as to monitor compliance.

All employees in the Heubach Group are called upon to uphold the provisions and ethical principles of the Code of Conduct within their activities at Heubach. Special responsibility rests with the management of our company, who are required to convey the meaning of the Code of Conduct to their employees and to support them in its implementation. Any violations may entail far-reaching consequences, both for the company as well as for the affected employees.

Anyone who becomes aware of violations of laws or this code is responsible for reporting these in order to protect the company. It is then generally possible to implement measures which avert or limit potential damages.



### Contact

In case of questions regarding the Code of Conduct, our employees can obtain in-depth advice from their supervisors, the departments, works council, human resources department or our data protection officer at any time.

Reports of violations can be submitted to the following contact:

Phone: +49 5326 52 312

Email: [annika.rottman@heubachcolor.de](mailto:annika.rottman@heubachcolor.de)

Published by:

Heubach GmbH  
Heubachstraße 7  
38685 Langelsheim  
Deutschland

Phone: +49 5326 52 0  
Fax: +49 5326 52 213

[annika.rottmann@heubachcolor.de](mailto:annika.rottmann@heubachcolor.de)  
[www.heubachcolor.com](http://www.heubachcolor.com)

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