



Code of Conduct



Preamble

Dear colleagues, dear readers!

Corruption has many faces. With this Code of Conduct we define our compliance rules and guidelines. Why are we doing that? Because everybody should know how to behave in unclear situations. What is right and what is wrong? Sometimes there is not only black or white. For this reason, we need strict guidelines, according to which everyone in the company acts. This code describes how to deal with inappropriate behaviour in connection with employees, suppliers, customers, competitors, interested parties and business partners. This is about property, including intellectual property, conflicts of interest and information. We define our values and what defines us at Alberdingk Boley: We are honest and authentic and behave seriously and fairly. We manufacture environmentally-friendly products and think and act sustainably. With this code of conduct we record what we are already living for a long company history and what we prove anew every day. Take your time to read! And, if you should ever get into a situation in which something 'seems to be strange' to you, do not hesitate and talk to your manager or directly to us. Always being there for you!

Our Ethics Goals

- 🔒 No cases of bribery or corruption
- 🔒 No cases of fraud
- 🔒 No money laundering
- 🔒 No information security breaches
- 🔒 No conflicts of interest

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Corporate policy

Our environmentally friendly binders refine, refurbish, link and protect surfaces. As an independent and globally operating middle-sized enterprise, Alberdingk Boley has been a partner for our customers for more than 249 years. That makes us special:

- 🌱 highest quality of our products and services
- 🌱 technique and innovation
- 🌱 a wide range of technology
- 🌱 our tradition is close customer relationship
- 🌱 a high appreciation of our employees
- 🌱 certified best practise safety
- 🌱 flexibility
- 🌱 sustainable thinking and care

Challenges inspire us! We provide the best solution for our customers.



About this code of conduct

Alberdingk Boley undertakes to act in accordance with the following rules. We are happy to prove this - even with unannounced visits, for example. Currently, during the COVID-19 pandemic, visits that have not been agreed upon are not possible for reasons of infection protection. In the following text, Alberdingk Boley is also referred to as 'the company' or 'the organization'.

Gender-specific terms

For reasons of better readability, we do not use gender-specific terms. So when we speak about 'the employees', we mean all employees, regardless of their gender.

1. Compliance with Applicable Laws

Alberdingk Boley complies with local, national and international law. We also strictly adhere to the requirements for environmental, health and occupational safety. We regularly face assessments by auditors and associations and are certified accordingly. You can find more about this on our homepage under 'Quality & Environment & Security'.

Alberdingk Boley bases its business activities on the principles of the United Nations Global Compact, the Guidelines of the Organization for Economic Cooperation and Development (OECD) for multinational enterprises, the core labor standards of the International Labor Organization (International Labour Organization, ILO), and the United Nations Universal Declaration of Human Rights.

2. Working conditions

A high level of appreciation for employees is part of Alberdingk Boley's self-image and is accordingly defined in the guidelines. As a company, we value attractive working conditions and compliance with human rights and equal treatment in the work environment. This also includes the following points:

Prohibition of sexual harassment and discrimination

We strongly condemn sexual harassment and sanction it accordingly. The same applies to bullying and disrespectful behaviour among colleagues. No matter what peculiarities someone was born with, what country someone was born in, what religion someone practices, what sexuality he or she lives: no one has the right to harass this person, e.g. by asking too intimate questions, making derogatory statements, etc Mobbing. We stand by that! In the event of violations through socially unacceptable behaviour or against applicable laws, we will take appropriate operational and labour law measures. The legal basis for this is provided by the ban on discrimination in force in Germany.

Hiring decisions must be made solely on the basis of the employee's qualifications. The employee's race, colour, gender, nationality, religion, age, maternity, marital status shall not be a consideration in decisions regarding salary, benefits, promotion, discipline, termination or advancement.

Derogatory comments based on origin, religion, age, or sexual orientation are not permitted in our company. We expect everyone in the company to treat one another with respect.

Prohibition of forced labor

Nobody is forced to work at Alberdingk Boley. The company expressly distances itself from prison or forced labor.

Prohibition of child labor

No person under the age of 16 is employed in the company. If the local legal age for work is greater than 16 years, the organization will not employ anyone younger than the legal age.

Working hours

The organization ensures that employees' working hours comply with local laws. In no event must an employee work more than sixty (60) hours per week or more than six (6) days for seven (7) days.

All employees of the organization are free to refuse the requested overtime without threat of dismissal, punishment or penalty.

Wages and benefits

All employees of the organization receive the higher amount of the statutory minimum wage and the statutory benefits or the wages and benefits applicable in the industry, whereby the employee is presented with a written statement during each compensation period in which the employee's compensation and any deductions from the employee Numbers are clearly visible.

Alberdingk Boley adheres to the agreed tariffs. The organization undertakes to pay higher hourly rates for late shifts than for normal shifts. The organization is not allowed to deduct penalties for disciplinary offenses from employee wages.

Non-discrimination

The organization makes recruitment decisions solely on the basis of the qualification of the employee to carry out the respective assignment. The organization may not make decisions regarding hiring, salary, benefits, promotion, discipline, termination or promotion based on the race, color, sex, nationality, religion, age, maternity or marital status of the employee or meet a potential employee.

Work environment

Alberdingk Boley attaches great importance to occupational safety. The company is committed to maintaining a work environment that is safe and healthy. Our goal is to fully comply with all applicable laws and regulations relating to working conditions at all times.

3. Privacy

Alberdingk Boley uses technical and organizational security measures to protect the data provided by employees and business partners from accidental or intentional manipulation, loss, destruction or access by unauthorized persons. In the case of the collection and processing of personal data, e.g. when using our homepage, the information is transmitted in encrypted form in order to prevent misuse of the data by third parties. Our security measures are continuously revised in line with technological developments.

GDPR guarantee for Alberdingk Boley's partners

The company guarantees compliance with the General Data Protection Regulation (GDPR). We are also bound by contract and confidentiality agreements with our business partners in order to achieve maximum trust and transparency on both sides. We undertake not to violate any industrial or intellectual property rights of third parties. Our employees also undertake not to disclose any confidential business information orally, in writing, in person or electronically without express permission. Confidential information from Alberdingk Boley's business partners is subject to a duty of confidentiality and is treated with the same care that Alberdingk Boley takes to protect its own information.

Customer information may be disclosed to authorized individuals exclusively for business purposes.

It is prohibited to send confidential data to personal email addresses or to disclose trade secrets to third parties.

Protection of copyrights and personal rights

When using images, photos, texts and products in official Alberdingk Boley media, e.g. on the homepage, in presentations or other publications, we are obliged to observe the respective copyrights and personal rights. Via data protection declarations and written declarations of consent from the persons shown, we ensure that these are only used if the rights of use have been transferred to us beforehand and within the framework of the agreement.

We only use images of people with their consent or within the framework of the legally permissible possibilities.

4. Dealing with company property

The employees handle the assets of Alberdingk Boley carefully and appropriately. You only use them for activities that serve business purposes. Company property also includes communication facilities and immaterial values such as knowhow and industrial property rights. Without the express consent of the responsible manager or through a corresponding company regulation, facilities or objects of the company are not used for private purposes or removed from the company premises.

5. Compliance with applicable rules in competition and antitrust law

Alberdingk Boley expects its employees to strictly comply with the applicable laws in the field of competition and antitrust law in all countries in which the company does business.

Prohibition of anti-competitive agreements

Alberdingk Boley is a privately owned company and defines its own business strategy completely autonomously and independently. The company expects employees to be extremely careful when dealing with Alberdingk Boley's competitors. It is strictly forbidden to make arrangements with competitors, e.g. setting sales prices, controlling or manipulating sales markets, influencing tendering procedures or dividing up territories. In unclear situations or if there are suspicions, employees are obliged to inform their superiors. Employees are also prohibited from influencing the resale of ALBERDINGK® brand products.

In the event of a breach of competition law provisions

Sharing information about prices, quantities, or the market with competitors is not permitted, nor are agreements regarding customers, regions, or bidding practices.

Participation in industry events, trade shows, conferences, and networking events supports our marketing efforts. Competitively sensitive information must not be discussed at these events. Violations of competition or antitrust law are severely punished by the antitrust authorities.

The catalogue of measures includes the annulment of agreements as well as high fines of up to 10% of the company's annual global turnover, as well as claims for damages by the victims by the competent civil courts, imprisonment and fines as well as internal disciplinary measures.

6. Honesty and Ethics in Business

Alberdingk Boleyn looks back on a long history. Integrity and honesty are the foundation of our company and are exemplified by the management. We undertake to comply with international agreements and applicable legal provisions in the field of anti-corruption and to apply them in the fight against improper influence in all countries in which the company is active. We condemn all forms of fraud and corruption. We are aware that corruption has many faces and we sensitize our employees accordingly.

No employee may, either directly or indirectly through an intermediary, offer, provide, guarantee, demand or accept an illegal benefit, monetary or otherwise - in order to effect a business relationship or a favor. It does not matter whether the person concerned is e.g. a customer or prospect, a political party, a financial institution or an official. Our requirement for honesty and ethics in business life leaves no room for such morally reprehensible behaviour. Accordingly, the company takes care to select trustworthy business partners in order to prevent such situations from occurring in the first place.

Political Contributions and Lobbying

Alberdingk Boleyn maintains political neutrality and upholds integrity, transparency, and compliance with applicable legal requirements in all advocacy activities. Political contributions, party donations, or similar contributions must not be used to gain business advantages, unduly influence decisions, or create the appearance of improper influence.

Donations to political parties, party-affiliated organizations, elected officials, or candidates are generally not made, or are made only in accordance with applicable legal provisions and with prior express approval from management. Employees' private political activities are not affected by this policy; however, they must be clearly separated from their work for Alberdingk Boley and may not be conducted on behalf of the company.

Advocacy with political decision-makers, government agencies, associations, or other public bodies must be conducted exclusively in a factual and transparent manner and in accordance with applicable compliance requirements. All employees who communicate with political or public bodies on behalf of the company must ensure that information is accurate, complete, and not misleading.

Gifts, invitations, or other benefits related to political contacts or lobbying activities must be reviewed with particular care and may only be provided if they are legally permissible, appropriate, transparently documented, and free from any expectation of a quid pro quo. In case of doubt, the responsible compliance or ethics office must be consulted in advance.

Gifts and invitations

The company also expects greater attention from employees when it comes to accepting gifts and invitations. These must be strictly limited. If business attention can be considered dissolute, it should be refused. Alberdingk Boley expects employees to be vigilant and to be able to objectively assess whether a gift given by a business partner or an invitation to an event can influence a business relationship.

Sometimes it is difficult to know the value of a gift before accepting it. Gifts of minimal value, such as a promotional pen or calendar, may be accepted. However, if a supplier extends an invitation to a luxurious trip or offers another expensive gift during ongoing contract negotiations, accepting it is not permitted and must be declined.

All employees have access to this Code of Conduct at all times and know that if they fail to comply, they will face disciplinary action. In case of doubt, employees are required to enter into a dialogue with their superiors.

Until binding internal thresholds are established, a placeholder value of 50 EUR shall serve as a guideline. Gifts, invitations, or other business courtesies with an estimated individual value of up to and including 50 EUR may be accepted or granted, provided they are appropriate, socially customary, justified by business reasons, and free from any expectation of consideration in return.

Gifts or invitations whose value exceeds the placeholder value of 50 EUR, or where there are doubts regarding their appropriateness, must be approved by the responsible manager before they are accepted or granted. This applies in particular to repeated gifts, invitations of a particularly entertainment-oriented nature, travel, overnight stays, or contacts with public officials and government agencies.

All gifts, invitations, and other benefits requiring approval must be documented in a traceable manner. The documentation must include, at a minimum, the type and estimated value of the gift, the occasion, the individuals or companies involved, the date, and the approval granted. This ensures that decisions are made transparently, verifiably, and in accordance with compliance requirements.

7. Compliance with import and export regulations

Alberdingk Boley is internationally active and supplies customers all over the world. We are committed to complying with the applicable rules of international trade.

This contains:

- 🔗 Strict adherence to the rules of registration and licenses / permits in the field of import and export to which our products are subject
- 🔗 Compliance with the rules of trade restrictions for both import and export - these can affect a country as well as a trading partner or product. Trade restrictions, such as embargoes or boycotts, against a certain country or for certain products are caused by national or international regulations and legal provisions. Trade restrictions for chemical substances that are illegally used for purposes other than those for which they are intended, such as the manufacture of chemical weapons, drugs or explosives, are strictly observed.
- 🔗 In the event of a violation of these rules, Alberdingk Boley and the employees involved expose themselves to the risk of sanctions that could damage the business and reputation of Alberdingk Boley.

8. Respect for the environment and sustainable action

Alberdingk Boley produces environmentally friendly binders and refines natural oils based on renewable raw materials. Sustainability is an integral part of our guidelines. We face the international comparison by the world's largest provider of sustainability ratings for companies, EcoVadis (www.ecovadis.com), and follow the guidelines of 'Responsible Care®', a voluntary initiative of the chemical industry.

Alberdingk Boley is DIN ISO-certified with regard to environmental, safety and energy management, and adheres to REACH (European Chemical Regulation), which regulates the manufacture, marketing and use of chemicals. You can find more about this on our homepage under 'Quality & Environment & Security'.

Environmental protection and sustainable action at and by Alberdingk Boley are also implemented through:

- 🔗 Responsible use of products
- 🔗 Risk prevention and regular safety inspections to identify and eliminate possible sources of danger
- 🔗 Use of technologies that protect the environment
- 🔗 Regular reporting on business activities
- 🔗 Efficient and sustainable use of resources
- 🔗 Waste management
- 🔗 Reduction of emissions
- 🔗 Networking and cooperation with authorities to think outside the box with regard to health, safety, the environment and quality

9. Prevention of Money Laundering

Money laundering harms fair competition and can contribute to the financing of criminal or terrorist activities – we as a company firmly oppose this. We are committed to strictly complying with all legal regulations for the prevention of money laundering.

We conduct business only with reputable partners and customers whose identities and business activities are verifiable and legally sound. We take any suspicions of money laundering very seriously and report them in accordance with legal requirements. We conduct regular training sessions to raise awareness among our employees. They are encouraged to act vigilantly, report any irregularities, and contact the appropriate internal departments if they have any concerns.

10. Dealing with Conflicts of Interest

We act with integrity, responsibility, and in the best interest of our company, regardless of location, culture, or hierarchy.

When does a conflict of interest arise?

Whenever personal, family, or economic interests conflict with the business interests of Alberdingk Boley, or could appear to do so.

Suppose an employee informs his or her superiors that a family member is employed by a potential supplier. That, in itself, does not constitute a conflict of interest.

It would be impermissible, however, for an employee to award contracts to a company in which he or she has a financial interest.

As a general rule, you should always obtain at least three comparative offers, if possible.

Alberdingk Boleyn operates worldwide. In an international environment, different cultural customs and business practices must be taken into account. Therefore, a transparent and respectful approach to potential conflicts of interest is essential. We expect all employees – regardless of location or function – to disclose potential conflicts of interest and, if in doubt, to contact the relevant compliance or confidentiality office.

This applies in particular to:

-  Private or family connections with business partners, customers, or competitors
-  Secondary employment, consulting activities, or business investments
-  Acceptance of gifts or invitations that go beyond reasonable business courtesy

Leaders have a special role model function in this regard: They bear the responsibility for creating an environment in which openness, integrity, and mutual respect are promoted – across cultural and national boundaries.

11. Compliance Governance

Alberdingk Boleyn has designated a responsible compliance office to implement and further develop our compliance requirements. BDO Legal is the legal advisory partner of BDO AG Wirtschaftsprüfungsgesellschaft, and via the link [HinSchG BDO -](#) the central point of contact for employees, executives, and external stakeholders regarding questions about legal, ethical, or internal company guidelines, as well as for reporting potential violations.

The responsible departments review incoming reports carefully, confidentially, and in accordance with a defined procedure. They are responsible for clarifying the facts, coordinating necessary investigations, and proposing or initiating appropriate measures. In doing so, they uphold the principles of proportionality, fairness, independence, and confidentiality.

In the case of serious violations or those that cannot be fully resolved at the departmental level, there are clearly defined escalation procedures. Depending on the nature and severity of the matter, the responsible managers, the executive board, or other functionally responsible departments are involved. The goal is to consistently address violations,

minimize risks to the company and those affected, and implement appropriate corrective and preventive measures. The effectiveness of the compliance system and the Code of Ethics is regularly reviewed and adjusted as needed.



Responsibilities

Who?	Responsibilities
Executive Management	Overall responsibility and escalation decisions
Executives	Implementation, serving as role models, and acting as first points of contact for compliance issues
Confidential Advisors	Receipt, documentation, and confidential handling of reports
Employees	Compliance with the Code of Conduct, reporting violations
Specialized Departments	Support for investigations and actions

12. Whistleblowing System

To ensure compliance with our ethical principles and legal obligations, we provide a confidential reporting channel through which employees and external stakeholders can report potential violations of laws, internal policies, or our Code of Conduct. Reports are received by an independent external ombudsman's office, which ensures that they are handled confidentially and, upon request, anonymously.

Individuals who report concerns in good faith are protected from disadvantage, discrimination, or other retaliatory measures. Any form of retaliation against whistleblowers will not be tolerated.

Incoming reports are reviewed and processed according to a defined procedure. The external ombudsman office documents and evaluates the reports confidentially and, if necessary, forwards them to the appropriate departments within the company for further investigation. Where

appropriate, suitable investigative and corrective measures are initiated. The entire process is conducted in strict confidence and in accordance with applicable data protection and whistleblower protection regulations.

13. Penalties for Violations

Alberdingk Boley does not tolerate violations of this Code of Conduct, applicable laws, or internal policies. Every reported or identified violation will be carefully reviewed and evaluated in light of the specific circumstances.

Depending on the nature, severity, and frequency of the violation, appropriate measures may be taken. These include, in particular, clarifying discussions, training or awareness-raising measures, organizational or procedural corrections, as well as measures under labor law, up to and including termination of employment. If necessary, civil or criminal proceedings may also be initiated, or the relevant authorities may be notified.

Disciplinary measures are imposed in a **proportionate manner, on a case-by-case basis, and in accordance with labor law requirements.**

The scope of application includes all employees, managers, and corporate bodies of the company. We also expect our business partners to adhere to comparable ethical and legal standards. In the event of violations by business partners, Alberdingk Boley reserves the right to take appropriate measures, which may include restricting or terminating the business relationship.

14. Requirements for Suppliers and Business Partners

Alberdingk Boley expects suppliers, service providers, and other business partners to adhere to the same ethical principles described in this Code of Ethics. These include, in particular, acting lawfully, with integrity, and responsibly, as well as complying with all applicable laws, regulations, and contractual obligations. These requirements are specified in our existing **Supplier Code of Conduct**. The Supplier Code of Conduct outlines Alberdingk Boley's expectations regarding responsible business conduct throughout the supply chain and serves as a binding foundation for our collaboration with suppliers and business partners.

In particular, we expect respect for human rights, the prohibition of child labor and forced labor, fair working conditions, non-discrimination, workplace safety, and the responsible use of the environment and resources. Furthermore, our suppliers and business partners commit to

avoiding corruption, bribery, money laundering, conflicts of interest, and other compliance violations. We also expect our business partners to appropriately incorporate these requirements into their own supply chains and to pass them on to relevant upstream suppliers. In the event of substantiated reports of violations, we reserve the right to investigate the matter, demand corrective measures, and, if no remedial action is taken, take appropriate action, up to and including the termination of the business relationship.

15. Participation and involvement of employees

A high degree of appreciation for our employees is part of our guidelines. We regularly provide information about our current and planned projects and involve employees in business decisions with the aim of constructive cooperation between management and employee representatives. We want colleagues who think for themselves and reward good ideas with an internal suggestion system. We provide regular training on our Code of Conduct. This Code of Conduct **valid without a handwritten signature.** We implement the code of ethics in our company and expect the same from our employees, business partners and those who would like to become one.

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