Code of Conduct

The purpose of the company is to trade in technical products, detergents, cleaning agents, cosmetic raw materials and food and feed additives, acting as a link between the manufacturing and processing industries. Corporate policy is a core element of our daily activities. We see our people as the key to our success.

We want to create value for our customers and grow sustainably. We want to achieve this through:

- Satisfied employees
- Satisfied customers
- Satisfied suppliers
- Satisfied stakeholders
- Sustainable management
- Continuously increasing shareholder value

There are four principles that govern how the goals of the company are to be achieved.

1. **Behaviour**
   This policy sets out rules for dealing with business partners and third parties. It also covers the handling of information, confidentiality and data protection, and the separation of personal and business interests.

2. **Saftey**
   This principle defines the culture of safety and sets out the safety rules for the following:
   - Food and feed safety
   - safe workplaces
   - safe facilities
   - safe transport

3 **Cooperation and leadership**
This principle outlines our understanding of collaboration and leadership. Trust and appreciation, motivation and success, recognition and development, teamwork and equal opportunities, work-life balance and the role model function of managers play a special role.

4 **Sustainability**
We recognise our responsibility for sustainability. Here are the sustainability principles that guide our sourcing and logistics, our manufacturing and products, and our community involvement.

1. Behaviour

Carl Dicke GmbH & Co. KG relies on the trust of customers, suppliers, employees and the public. CD's reputation is largely determined by the appearance, actions and behaviour of each individual employee. Every employee is required to comply with rules and codes of conduct in order to enhance our positive image.
The basic principles include compliance with relevant regulations, fair dealing with our business partners and third parties, and free competition.

Regulatory compliance
We will always act in accordance with the relevant legal requirements and our internal standards and rules. Failure to comply with health and safety regulations or employee rights is illegal and will not be tolerated.

Bullying and sexual harassment
The company promotes a respectful and appreciative working environment. Bullying and sexual harassment will not be tolerated.
Bullying is defined as any continued or systematic behaviour that aims to, or is likely to, demean, exclude, or violate the dignity of others.
Sexual harassment, as defined in Section 3(4) of the AGG, is any unwanted, sexually determined behaviour that violates the dignity of the individual, such as suggestive remarks, unwanted touching, or disseminating sexual content.
Violations can be reported confidentially. Discrimination against individuals who report violations is prohibited.
Violations will result in appropriate labour law measures.

Free competition and export control compliance
Antitrust and competition laws form the legal framework within which we operate. Our employees are required to comply with antitrust and competition laws. Agreements with competitors that could or should prevent or restrict competition are serious violations of the law.
That means:

- No oral or written agreements or arrangements concerning the prices at which products are bought or sold.
- No allocation of markets, customers or production capacity
- No fixing of resale prices to our customers. No favouring or excluding contractual partners
- No disclosure of inside information to third parties
- No barter transactions
- Compliance with export control, trade restriction and sanctions laws

Gifts and invitations
Our relationships with suppliers, customers and other business partners are based on fair dealing and our business decisions are made on a solid foundation.
Excessive gifts and entertainment could compromise our ability to make business decisions free from conflicts of interest.
Gifts and entertainment may be accepted without approval if they are of low value and can be considered to reflect generally accepted, moderate local business practices.

The rules also apply to gifts and entertainment offered by our employees to third parties. Particular care must be taken when dealing with suppliers, customers or third parties who have an ongoing business relationship with our company. Invitations of a significant value should not be extended.

Donate and Sponsor
CD makes donations on a voluntary basis, without asking for anything in return.
We donate money to education, culture, health and sport, as well as social projects.

Confidentiality and data protection
We respect the privacy of our employees and comply with data protection legislation.
Business, operational, customer and employee information is subject to confidentiality. When processing company data in the IT system, each employee must comply with the obligations set out in his or her employment contract. The confidentiality of business information is part of our employment contracts.

Financial integrity
CD cannot be used for illegal transactions. We take great care to ensure that financial transactions are conducted in a lawful manner. Financial transactions involving risk must not be carried out without consultation.

Separation of private and business interests
Company property
We use work equipment and other Company property carefully, appropriately and only for Company purposes, unless otherwise agreed.

Business relations
The selection of customers and suppliers, as well as all other business relationships, must be based on objective criteria. We do not tolerate any form of bribery, corruption or personal gain by employees.
We respect copyright and trademark rights and use them only with prior permission.

Social commitment
CD welcomes the involvement of its employees in voluntary work. However, such involvement must pursue legally permissible objectives and must not violate fundamental democratic values. Furthermore, it must not lead to a neglect of the individual employee's duties within the company.

2. Safety

The safety and health of our employees and customers is our greatest asset. Safety is therefore one of the most important responsibilities of managers and employees.
To achieve this, we continuously develop our safety culture. We empower and motivate every employee to behave safely and to take responsibility:

- for the safety of food and feed
- for our own safety and the safety of our colleagues at work
- for the safe operation of equipment
- for safe transport

Product safety of food and feed
CD considers product safety along the entire value chain - from raw material supplier to customer. The aim is to ensure that our products pose no risk to humans or animals when used correctly.

Food Safety Culture
At our company, food safety is at the heart of everything we do. Managers set an example by demonstrating a high level of awareness and promoting open communication. Each and every one of our employees takes personal responsibility for the quality and safety of the food and feed that we sell. Risks and errors are transparently addressed, analysed and rectified. Through continuous training, clear responsibilities and exemplary leadership, we ensure that food safety is practised throughout our company, not just as a legal obligation.

For us, product safety means:

- We require our suppliers to comply with specifications for every order.
- The products we trade comply with food law regulations, the E-number regulation, the Food Chemical Codex (FCC), and EU Regulation 1831/2003 on additives in animal nutrition.
- We always keep information on our products up to date.
- We provide safety data sheets for all products we sell.

Safety of our workplaces
We provide clear rules and procedures to prevent hazards in the workplace:

- We identify and assess workplace hazards.
- We analyse accidents and derive measures to prevent recurrence.
- We ensure that personal protective equipment is always available and used, complete and undamaged.

- We do not expose vulnerable groups, such as pregnant women and young people, to hazardous work. We reject all forms of forced and child labour.
- We accept and implement suggestions for improvement to enhance safety.
- Alcohol and drugs are prohibited in the workplace during or immediately before work.

Safety of our systems
To prevent damage to the environment, explosions or fires, the design, construction, operation and maintenance of facilities are subject to strict principles:

- We plan, build and operate our facilities in a way that does not endanger people, the environment or property. We take into account the state of the art.
- We maintain our systems and equipment and inspect them regularly.
- We follow and develop the emergency plan, which governs the cooperation of internal and external emergency services in the event of damage.

Transport safety
CD considers transport safety throughout the value chain - from raw material suppliers to our customers. The aim is to ensure that our products do not pose a risk to people or the environment during transport.
For us, transport safety means:

- We meet the legal requirements of the ADR Dangerous Goods Regulations, the EU-wide REACH Chemicals Regulation and the GHS Dangerous Substances Regulation.
- Vehicles and swap bodies with tank containers and tarpaulin bridges are maintained and inspected. Equipment is regularly inspected.
- Vehicles are inspected before being loaded with dangerous goods. We reject vehicles with defects.

Cooperation and leadership behaviour

Our working relationship is based on personal appreciation, trust, motivation and empowerment. For us, supporting and challenging employees are inseparable. We are committed to our employees by providing qualifications and training. We expect a high level of motivation and professional and social skills.

Trust and appreciation, motivation and ownership
We believe that we can only be successful if we work together on the basis of personal appreciation, respect, tolerance and trust, as well as motivation and commitment.
We value open communication. Employees and managers exchange information quickly and comprehensively. This enables employees to act and make decisions responsibly. We address conflicts openly and resolve them fairly, including when assessing performance. Appreciating the individual is as important to us as recognising good performance and results.

Performance, results and success
The following principle applies to all employees and managers at CD: We build on performance and results. The success of the company as a whole takes precedence over individual interests.
Our managers are role models in this respect. They create the conditions for the individual success of the employee and thus for the success of the company. We believe in empowering our people and giving them the freedom to make their own decisions.

Teamwork, diversity and equal opportunities
Together we are strong: we see the diversity of our employees as an asset. Teamwork - across disciplines and departments - is an essential key to this. We offer equal opportunities to all employees.
We recruit new employees on the basis of their qualifications, potential and personality. Gender, age, origin, religion, ideology or sexual orientation do not play a role in personnel decisions. Discrimination on these grounds will not be tolerated. We offer advice and support to new colleagues.

Wages and working hours
Wages for regular working hours, overtime and overtime pay comply with the law and are based on the collective agreements for wholesale and foreign trade. Wages are paid regularly.
National legislation on working hours is complied with. The maximum weekly working hours apply, but 48 hours must not be regularly exceeded.

Challenges, mistakes and changes
We see problems and challenges as opportunities to which we respond quickly and flexibly. We are open to new solutions and approach problems in a results-oriented way. We strive for continuous improvement and want to develop our knowledge and skills for current and future needs. We are prepared to make mistakes, learn from them and try new things. Suggestions for improvement from employees are taken on board, assessed for feasibility and implemented wherever possible.

Balancing family and career
It is a key concern for CD to offer employees a high degree of organisational freedom. As far as operational processes allow, working hours can be organised flexibly.

3. Sustainability

We have a responsibility for the future. That is why sustainable corporate management is a key driver of our actions. Reducing the consumption of resources such as raw materials, energy and water is one of our priorities for sustainable management. The reduction of solid and liquid waste is an ongoing goal.

Purchase and logistics
When selecting suppliers and contractors, we look at their performance in terms of sustainable and socially responsible business practices. We only work with suppliers and contractors who have proven themselves to be trustworthy and who deliver consistent, specified quality.
We attach great importance to the safety of transport and storage of our products. We do everything possible to avoid risks. We use trained personnel for the packaging, storage and transport of dangerous goods.

Products and production
We work to manufacture safe, environmentally friendly and user-friendly products, as far as we can influence this as a dealer and service provider. We support our customers in the safe and responsible handling of our products. We continuously improve the productivity and safety of existing systems. We build new plants according to the latest state of the art. Both contribute to further reducing resource consumption and environmental pollution.

Certifications
The ongoing certifications are an incentive to optimise our processes and to adapt even better to market conditions.

Social commitment
We assume responsibility by supporting social and cultural projects and organisations in the local area and by promoting the education of young people through internships and apprenticeships.
We help people in need all over the world through sponsorships or by supporting the DKMS gemeinnützige GmbH (formerly the German Bone Marrow Donor Centre).