

Petrofer-Group

Code of Conduct

1. Purpose and Scope

This Code of Conduct (“Code”) defines the binding principles and minimum standards governing the conduct of all members of management, executives, employees, and, where applicable, third parties acting on behalf of the Petrofer Group and its affiliated companies (collectively referred to as “Petrofer”).

This Code applies to all companies within Petrofer worldwide and shall be complied with in conjunction with all applicable laws, regulations, and internal policies (“legal requirements”).

Where local legal requirements impose stricter standards than those set out in this Code, such requirements shall prevail.

2. Core Principles

Petrofer is committed to conducting business with integrity, responsibility, and transparency.

All employees are required to:

- act in the best interests of the company
- comply with all applicable legal requirements
- adhere to recognized ethical standards
- refrain from any conduct that could harm the reputation of Petrofer

Petrofer promotes a culture of compliance, accountability, and responsible business conduct at all organizational levels.

3. Human Rights and Labour Standards

Petrofer respects internationally recognized human rights and is committed to conducting its business in accordance with internationally recognized human rights principles, including the Universal Declaration of Human Rights, the core labour standards of the International Labour Organization (ILO), and the UN Guiding Principles on Business and Human Rights.

Child labour, forced or compulsory labour, human trafficking, and any form of modern slavery are strictly prohibited.

All employment relationships must be voluntary. Employees shall receive clear and transparent written employment terms in a language they understand.

Petrofer ensures compliance with applicable legal requirements, in particular with regard to:

- minimum wages
- working hours
- occupational health and safety

Discrimination or harassment of any kind will not be tolerated. Petrofer promotes a diverse, fair, and inclusive working environment and supports equal opportunities regardless of origin, gender, identity, religion, disability, or sexual orientation.

Recruitment processes shall be conducted in a fair, transparent, and ethical manner and must not involve undue influence, coercion, or misleading practices.

Petrofer respects the rights of individuals and communities with regard to land, water, and natural resources. Unlawful expropriation, forced eviction, and interference with legitimate usage rights are strictly prohibited.

Security personnel shall only be deployed in compliance with applicable law and internationally recognized human rights standards. The use of excessive force or unlawful measures is strictly prohibited.

Freedom of association and the right to collective representation shall be respected in accordance with applicable legal requirements.

4. Occupational Health, Safety and Environmental Protection

Petrofer provides safe and healthy working conditions and complies with all applicable legal requirements relating to occupational health, safety, and environmental protection.

A high level of safety is maintained through preventive measures, training, and regular inspections.

All employees are required to:

- comply with applicable safety rules and procedures
- report hazards, incidents, or unsafe conditions without delay

Petrofer is committed to minimizing environmental impact and promoting sustainable practices, in particular through:

- efficient use of resources
- reduction of emissions
- environmentally responsible production processes

5. Anti-Corruption and Business Integrity

Petrofer maintains a zero-tolerance approach to corruption and bribery.

It is strictly prohibited to offer, promise, grant, request, or accept improper advantages, whether directly or indirectly.

This applies in particular to dealings with public officials as well as business partners.

Facilitation payments are prohibited unless explicitly permitted under applicable law.

Business decisions shall be made solely on objective and professional criteria and must not be influenced by improper benefits.

6. Conflicts of Interest

Employees must avoid situations in which personal interests conflict, or may appear to conflict, with the interests of the company.

Any actual or potential conflict of interest must be disclosed promptly to the relevant supervisor or compliance function.

7. Fair Competition and Antitrust Compliance

Petrofer is committed to fair competition and compliance with all applicable competition and antitrust laws.

In particular, the following are prohibited:

- price fixing
- allocation of markets or customers
- exchange of competitively sensitive information
- participation in anti-competitive agreements or practices

Employees must not engage in discussions or exchanges of competitively sensitive information with competitors unless expressly permitted by applicable law.

8. Data Protection and Confidentiality

The protection of personal data and confidential information is of high importance.

Personal data shall be processed exclusively in accordance with applicable legal requirements, including compliance with applicable data protection regulations such as the General Data Protection Regulation (GDPR), where applicable.

Confidential information, including trade secrets and intellectual property, must be safeguarded and used only for legitimate business purposes.

9. Financial Integrity and Documentation

All business records and reports must be accurate, complete, and transparent.

False entries, manipulation, or misleading representations are strictly prohibited.

Financial transactions and documentation must reflect the true nature of the underlying activities and comply with applicable accounting standards.

10. Protection and Proper Use of Company Property

Company property must be handled with due care and used exclusively for business purposes.

It must be protected against loss, damage, theft, and misuse.

Unauthorized use or disposal of company assets is strictly prohibited.

11. Dealings with Business Partners

Petrofer expects its business partners to comply with standards equivalent to those set out in this Code.

Appropriate due diligence measures shall be carried out prior to engaging third parties.

Petrofer expects its business partners to implement comparable standards within their own supply chains where appropriate.

In the event of serious violations, Petrofer reserves the right to take appropriate action, including termination of business relationships.

12. International Trade Compliance and Sanctions

Petrofer complies with all applicable laws and regulations relating to export controls, embargoes, and economic sanctions.

Transactions that violate such regulations are strictly prohibited.

Employees must ensure that all applicable trade restrictions are observed before conducting international transactions.

13. Whistleblowing System and Protection Against Retaliation

Employees may report violations of this Code or applicable legal requirements through appropriate reporting channels.

Petrofer provides suitable and confidential whistleblowing mechanisms.

Reports may be submitted anonymously, where permitted by applicable law.

Individuals who report concerns in good faith shall be protected from retaliation, discrimination, or disadvantage.

14. Implementation and Enforcement

Compliance with this Code is mandatory for all employees.

Managers bear particular responsibility for:

- communicating the principles of this Code
- ensuring implementation within their area of responsibility
- monitoring compliance

Violations of this Code may result in disciplinary action as well as civil or criminal consequences where applicable.

15. Final Provisions

This Code shall be supplemented by internal policies and procedures where necessary.

Petrofer reserves the right to review and amend this Code as required.

This Code does not create contractual rights for third parties unless expressly agreed in writing.

This Code of Conduct forms the foundation for responsible, ethical, and sustainable business conduct throughout the Petrofer Group.

Managing Board of Petrofer Chemie H. R. Fischer GmbH + Co. KG, Petrofer GmbH and
Fischer Equity GmbH & Co. KG



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