

# Code of Conduct



**NORDMANN**

## **1. Preface**

Responsible corporate management at Nordmann has always played an important role. That is how it should be in the future as well. In the more than 100 years of its existence, our family-owned company has stood for continuity and personality. Fairness and respect are the basic principles and rules for our conduct towards our employees<sup>1</sup> and in relation to our external partners.

We are aware that we have reciprocal relationships with various stakeholders. Among others, these include our employees, suppliers, customers, partners, the advisory board, the managing board and other business associates, in addition to the general public and environment. In all our company decisions and activities, we aim to keep sight of their legitimate interests and to act both accordingly and responsibly. It is for this reason that we maintain regular dialogues with our most important groups of stakeholders.

## **2. Why a code of conduct?**

Our entrepreneurial actions are based on the respective legal systems of the different countries and regions we are active in. Further to these, the following compliance guidelines apply to us here at Nordmann. They delineate our fundamental principles and regulate behavior within our company as well as in relation to our external partners and the general public.

The conduct guidelines set out how we as a company perceive our ethical, legal and social responsibilities as we work to fulfil our vision and mission statement. They are the expression of our corporate values: responsible family-owned company – reliable partner – respect.

The present conduct guidelines are intended to strengthen awareness of the law, moral standards and responsibility as integral parts of our corporate policy. They should serve to support our employees in their daily business and protect them from committing misconduct. In addition, they should advise employees of how to handle the wrongdoing of third parties. Each employee influences the reputation of the company through his or her actions. The key message is that only clean business is Nordmann business. Only together with our employees we can sustainably preserve the reputation of our company.

## **3. Validity**

The present conduct guidelines apply to all Nordmann employees and managing directors, in Germany as well as worldwide. Furthermore, Nordmann sets great store on these conduct guidelines being observed by external service providers (e.g. consultants) and other partners in business.

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<sup>1</sup> This refers to all Nordmann staff members, including trainees.

Nordmann expects the conduct guidelines to not only be lived internally, but also to be practiced while dealing with customers, suppliers, business partners or any other parties. These lay the foundation for cooperative business relations, based correspondingly on the Nordmann values of trust, respect and reliability.

All employees are called upon to live up to these conduct guidelines. In the event of non-compliance with these guidelines, various channels of communication are open to those concerned. These will be described at the end of the document.

#### **4. Legal Compliance**

The compliance with laws and legal systems of the respective country in which we have business activities is a fundamental principle of Nordmann. Each employee must comply with the laws of the applicable legal systems of the countries in which we operate. All courses of action which are illegal or which would result in liability claims are prohibited.

Additionally, Nordmann expects the same compliance from each of our business partners.

We are well aware that the human and labor rights of people are not adequately protected in all countries around the world. Within our sphere of influence then, Nordmann also demands compliance with appropriate international standards of conduct (human rights in the workplace, core labor standards of the International Labour Organisation).

#### **5. Fair Competition**

Fair competition is a precondition of a free market development and the associated social benefit. Accordingly the precepts of fairness, transparency and traceability each apply.

Employees of Nordmann commit themselves to engaging in fair competition and complying with current anti-trust and business law. For us, this means striving towards clear, transparent advertising and sales practices, in addition to providing genuine, non-misleading information to all business partners and the general public.

Nordmann pays extremely close attention to compliance with fair trade laws. Agreements with competitors and other practices which illicitly inhibit free and open competition shall not be permitted by any member of staff. This applies to managerial staff in particular, not only because of their involvement in decision-making, but also due to the role model function associated with their positions.

Illegal behavior includes, in particular, undue influence on prices and conditions, e.g. arrangements and agreements with competitors. Legally protected and relevant competitive information is neither permitted to be passed on nor to be asked for.

## **6. Prohibition of Corruption, Bribery and Dishonest Influence**

Nordmann employees are not permitted to unlawfully influence business partners or be unlawfully influenced by them. Therefore, employees are prohibited from receiving promises for or accepting any type of inducement from third parties, regardless of whether this is done directly or indirectly, for themselves or for others. It is equally prohibited for employees to promise, offer or grant any such inducements or other advantages to third parties.

In this context, “third parties” are companies or people that are associated with the business doings and/or interests of Nordmann.

Exceptions to these prohibitions include occasional and tax-deductible gifts as well as invitations to business dinner or events, to the extent that they are appropriate, comply with applicable laws and regulations, and do not serve to generate unlawful influence or preference.

In cases of uncertainty, employees are to seek clarification from Nordmann beforehand.

A reciprocal zero-tolerance rule applies to dealings with public authorities and representatives; this means no gifts or invitations are to be exchanged or extended.

Nordmann exclusively maintains business relations with reputable customers and business partners who are involved in lawful business activities and whose funds are derived from legitimate sources.

Nordmann is aware that the payment of bribes is accepted custom in certain countries in which it operates. Nordmann dissociates itself expressly from such practices.

## **7. Charitable Contribution and Sponsoring**

In accordance with our values, we have a responsibility toward our company, our employees, all of our business partners and also toward all other stakeholder groups. Nordmann takes this responsibility very seriously and strives to fulfil it both in day-to-day business and beyond, in order to make simultaneous contributions towards long-term and sustainable development.

For this reason we donate to a variety of social and cultural benefit projects, primarily within the Hamburg area. All payment transactions are legally compliant and well-documented to ensure maximal transparency.

Nordmann makes no political contributions of any kind and does not sponsor private parties or organizations whose aims are not compatible with Nordmann’s company principles.

## **8. Respect for Basic Human Rights of Employees**

We respect the personal dignity, privacy and fundamental rights of every individual. We support equal treatment and equal opportunities for our employees.

Consistent with our company principles and with the core labor standards of the International Labour Organization (ILO)<sup>2</sup>, we do not tolerate discrimination against races or ethnic backgrounds, skin color, nationality, religions, speech, world view, gender, age, disabilities, constitution, appearance, sexual identity or on the basis of any other circumstance. These principles apply to both internal cooperation and conduct towards external partners. Inacceptable treatment of staff members, e.g. bullying, harassment (sexual or personal) or discrimination will not be tolerated.

Nordmann complies with the statutory employment laws, particularly those concerning maximum working hours, of each of the countries that we work in.

Nordmann dissociates itself from any child and forced labor.

## **9. Health and Safety of Employees, Environmental Protection**

The physical health, psychological integrity and safety of our employees are all of great importance to Nordmann. Each of our employees has a shared responsibility to uphold work safety standards in the workplace.

Nordmann views environmental protection and the conservation of natural resources as another important part of creating sustainable development. In keeping with our values, Nordmann also takes responsibility in this area and is involved in the Responsible Care Program of the VCH (association of the chemical trade), as well as FECC (European Association of Chemical Distributors).

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<sup>2</sup>Convention No. 87 – Freedom of Association and the Right to Organise, 1948

Convention No. 98 – Right to Organise and Collective Bargaining, 1949

Convention No. 29 – Forced Labour, 1930

Convention No. 105 – Abolition of Forced Labour, 1957

Convention No. 100 – Equal Remuneration, 1951

Convention No. 111 – Discrimination (Employment and Occupation), 1958

Convention No. 138 – Minimum Age, 1973

Convention No. 182 – Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999

## **10. Handling of Information / Data Protection**

Open communication requires accurate reporting. Fundamental business processes need to be documented properly and truthfully. Information which is relevant to accounting must be gathered completely and accurately according to the policy of financial integrity.

Confidential trade or company information which is not intended for the public is to be considered under obligation of secrecy. The duty of secrecy extends beyond termination of employment. Personal data may only be collected, processed, or used insofar as it is necessary for specific and legitimate purposes. Furthermore, personal data must be maintained in a secure manner<sup>3</sup>. All employees are bound to uphold applicable data protection laws and regulations in order to protect the personal rights of business partners, co-workers and third parties<sup>4</sup>.

## **11. Avoiding Conflicts of Interest**

It is the duty of Nordmann employees to make business decisions in the best interest of Nordmann, rather than for personal benefit. In this respect, conflict of interests in terms of personnel decisions and business relationships with third parties are to be avoided. Personal and financial ties (e.g. through relatives, relationship by marriage and/or close friendships) to business partners and Nordmann customers must be communicated immediately and without request to the employer.

Any secondary employment whether paid or unpaid, self-employed or employed, requires the prior approval of Nordmann. Nordmann will give its consent if legitimate interests of Nordmann regarding the secondary employment are not affected. Secondary employment within the scope of private hobbies that have no bearing on the legitimate interests of Nordmann does not fall under this consent requirement.

Interviews or other public statements which concern Nordmann's area of operations require the prior agreement of the employer.

Items belonging to Nordmann may not be used for private purposes without express approval from the managing board. Furthermore, all Nordmann employees are obliged to treat third-party property (intellectual and/or material) with respect and care.

The managing board shall decide what is to be done with company property that is no longer needed. Taking advantage of benefits arising from employment (e.g. invitations to sporting or entertainment events), requires the prior written approval of a supervisor.

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<sup>3</sup> See IT Security Guidelines

<sup>4</sup> See IT Security Guidelines and Social Media Guidelines

Internet use, as well as other means of electronic communication (e-mail and fax), is without exception for official purposes only. Private utilization is not allowed<sup>5</sup>.

## **12. Compliance**

Nordmann calls the attention of all employees to the content of our conduct guidelines (e.g. by emailing the Code of Conduct to employees, informing new staff members) and expects its employees to comply with them. Implementing and adhering to the guidelines is, for all members of staff, both protection and obligation at the same time. Structural implementation measures (such as strict adherence to a peer monitoring system) help support not only each individual employee, but also the integrity and success of Nordmann.

Therefore all members of staff are called upon to help one another comply with these guidelines.

Given their positions and role model function, management staff assumes a special role in the communication and implementation of this Code of Conduct.

These guidelines cannot address everything relating to the subjects of integrity and compliance. In so far as an employee is not sure about the right thing to do in a specific case, he/she may consult their superior as well as the incumbent persons of confidence<sup>6</sup>. Violations of this Code of Conduct are to be communicated to the respective supervisor, appointed representative and/or management board without delay. If necessary, this may be done anonymously.

Nordmann is obliged to immediately follow up on all such reports and closely examine the possibility of any misconduct.

The disregard and infringement of the governing law and present Code of Conduct may not only have extensive ramifications for Nordmann, but also in each case will result in disciplinary action for the staff member in question, up to and including dismissal and/or criminal consequences.

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<sup>5</sup> See IT Security Guidelines

<sup>6</sup> Names not shown in the public version