

## Message from the CEO

“ProChema stands for long-term business, trust, continuity, sustainability, organic growth and development. Our stakeholders are a key factor in our strategy, we value and encourage a transparent environment. Our Code of Business Conduct & Ethics standards express the high level of commitment, responsibility and integrity we expect from all of our employees and partners.”

*Werner Figlhuber*

## Preamble

At ProChema, this Code of Conduct defines the fundamental business principles that guide all our actions and decisions. These principles apply to ProChema and its affiliated companies. Integrity is the basis of our reputation and is essential for delivering excellence to our customers.

We are committed to ensuring the company’s long-term stability and success by maintaining a solid financial basis. This requires carefully balancing short-term demands with long-term goals, while building fair and respectful relationships with our customers, employees, and business partners.

Should employees face any uncertainty about the appropriate course of action, they are encouraged to consult the Compliance Officer. All concerns raised will be treated with confidentiality and respect. Non-compliance by internal or external partners will not be tolerated and will be addressed in accordance with our policies.

As a signatory of the *United Nations Global Compact*, ProChema is committed to supporting its *Ten Principles* on human rights, labor, environment, and anti-corruption. We actively integrate these principles into our strategy, culture, and daily operations, while engaging in collaborative projects that contribute to the broader goals of the United Nations, particularly the Sustainable Development Goals.

## Human Rights / Fair Labor Conditions

Our employees are the basis of our success. ProChema sets all possible steps to provide a respectful and fair working environment.

ProChema follows the principles outlined in the *EU Charter of Fundamental Rights*, the *International Labour Organization (ILO) conventions*, and complies with the *United Nations Guiding Principles on Business and Human Rights*. We require that all employees and business partners adhere to these standards in every aspect of employment and business relationships.

We are fully committed to preventing any form of human rights violations, such as forced labor, child labor, and any form of exploitation within our operations and across our supply chain. ProChema regularly conducts risk assessments and audits of our suppliers to ensure full compliance with international labor standards and best practices.

- *Respect Personal Dignity and Rights*: Ensure the personal dignity, privacy and rights of each individual are respected at all times
- *Prohibit Forced Labor*: Strictly prohibit the use of forced labor, including involuntary prison labor, slavery or human trafficking.
- *Prohibit Child Labor*: Guarantee that child labor is never used under any circumstances.
- *Commit to Non-Discrimination*: Ensure that hiring, promotion, and treatment of employees are free from discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political views, or sexual orientation.
- *Maintain a Safe Working Environment*: Provide a workplace free from harassment, discrimination, violence, retaliation, or any disrespectful behavior.
- *Comply with Legal Working Hours*: Ensure all working hours, including overtime, comply with all legal requirements.
- *Guarantee Fair Wages*: Pay fair wages that exceed the minimum legal standards and reflect the value of employees' work.
- *Right to Freedom of Association and Assembly*: Ensure that employees have the right to form or join trade unions, engage in collective bargaining, and participate in peaceful assembly without fear of retaliation.
- *Provide Training and Development*: Offer employees opportunities for training and development to support their growth and personal success.
- *Encourage Participation*: Promote open participation from employees in improving business processes and operations.
- *Support Whistleblower Protection*: Ensure an environment where employees can raise concerns without fear of retaliation, ensuring they have a confidential reporting mechanism.

## Diversity / Equality / Inclusion

Employment and promotion within ProChema are based on qualifications, individual performance as well as professional and social competencies.

ProChema monitors and reports diversity metrics on an annual basis, ensuring transparency in areas such as gender pay equity and opportunities for underrepresented groups. We are committed to creating an inclusive environment where diversity is recognized as a strength and actively supported throughout the organization.

- *Respect* the diversity of our employees and promote an inclusive work and corporate culture.
- *Ensure* equal treatment for all employees, with no favoritism or discrimination.
- *Reward* performance and achievements fairly, ensuring gender pay equity.
- *Encourage* diversity at all levels of the organization and in all decision-making processes.
- *Support* initiatives that promote a balanced and inclusive workforce, providing opportunities for professional development across all employee groups.

## Health and Safety

ProChema ensures a safe and healthy environment, recognizing that both physical and mental well-being are essential to our success.

- *Safe Workplace:* We ensure a safe workplace for all employees, in compliance with relevant health and safety regulations.
- *Employee Awareness:* We raise awareness of health and safety standards through regular training and development programs.
- *Hazard Control:* We identify and control hazards, implementing preventive measures to avoid accidents and occupational diseases
- *Mental Well-being:* In addition to physical safety, ProChema acknowledges the importance of mental well-being. We provide access to mental health resources and promote a work-life balance that supports employees' overall well-being.

## Environmental Management

ProChema is committed to environmental sustainability and integrates environmental considerations into its business activities.

- *Sustainability Goals:* ProChema strives to reduce its carbon footprint, increase the use of renewable energy, and minimize waste. We plan to introduce annual sustainability reporting to track our progress, ensuring compliance with the European Green Deal and EU environmental regulations.
- *Carbon Neutrality:* As an office-based company with global supply chain logistics, our goal is to achieve carbon neutrality in our direct operations by 2030. We are also actively exploring ways to reduce emissions in our supply chain, including collaborating with shipping partners on lower-emission transportation options.
- *Resource Efficiency:* We maximize efficiency in the use of raw materials, energy, and water to reduce our environmental impact.
- *Waste Reduction:* We are committed to reducing waste, particularly in energy and water usage, through improved processes and sustainable practices.
- *Environmental Compliance:* ProChema conducts its business in an environmentally responsible manner, adhering to all applicable environmental laws and regulations.
- *Minimizing Pollution:* We continuously seek ways to minimize environmental pollution and improve our environmental footprint.
- *Supplier Evaluation:* We carefully assess our partners and suppliers based on their adherence to ProChema's standards, national and international regulations, and sustainability assessments.

## Business Ethics

ProChema is committed to maintaining the highest standards of ethics and integrity in all our business practices. We do not tolerate any form of corruption or bribery.

All employees receive regular training on anti-corruption, anti-bribery, and business ethics to ensure compliance with *EU regulations*, including the *EU Whistleblower Protection Directive* and other relevant laws. Employees are encouraged to raise concerns without fear of retaliation.

- *Ethical Business Practices:* Conduct business ethically and in compliance with all relevant laws and regulations, including but not limited to:
  - *Anti-Corruption and Anti-Bribery Laws:* Employees and business partners will not offer or accept bribes, kickbacks, favors, or use improper influence when dealing with government officials or in any business arrangements.

- *Compliance with Antitrust Laws:* ProChema adheres to antitrust and competition laws to ensure fair market practices
- *Intellectual Property:* Respect the intellectual property rights of others and comply with all applicable laws governing intellectual property
- *International Trade Compliance:* Ensure full compliance with international trade and export control regulations.
- *Conflict of Interest:* Employees must disclose any actual or potential conflicts of interest, ensuring that personal interests do not interfere with ProChema's business activities.
- *Whistleblower Protection:* ProChema provides a safe, confidential, and anonymous reporting mechanism for employees to report any violations of business ethics, without fear of retaliation.

## Supply Chain & Responsible Sourcing

ProChema ensures that all suppliers and partners meet the same ethical, environmental, and social standards that we hold ourselves to.

- *Supplier Accountability:* ProChema holds all suppliers and business partners accountable to the company's Code of Conduct and international standards. This includes compliance with the *EU Conflict Minerals Regulation* and the *Corporate Sustainability Due Diligence Directive (CSDDD)*.
- *Audits and Risk Assessments:* We conduct regular supplier audits and risk assessments to verify compliance with ethical, environmental, and social standards. Suppliers must demonstrate compliance with international labor laws, human rights protections, and sustainability initiatives.
- *Sustainable Sourcing:* Suppliers are required to incorporate sustainability into their practices, minimizing environmental impact and ensuring responsible use of resources throughout the supply chain.
- *Collaborative Partnerships:* ProChema actively collaborates with suppliers to improve their ethical, environmental, and social practices, offering support and guidance where needed to meet these standards.

## Competition and Antitrust Law

ProChema is committed to competing fairly and ethically, in full compliance with all applicable competition and antitrust laws. We believe in healthy competition and strive to succeed based on the quality of our products and services, ensuring compliance with local, national, and international competition regulations.

- *Fair Competition:* We strictly avoid any practices that could restrict fair competition. We do not engage in the exchange of sensitive information with competitors, including information about pricing, market allocation, or any agreement that could lead to unfair advantages.
- *No Collusion:* ProChema does not participate in any agreements or understandings that violate competition laws, such as price-fixing, market sharing, or efforts to exclude specific competitors or business relationships from the market.

## Gifts and Entertainment

ProChema strictly prohibits offering, promising, or giving bribes, kickbacks, or other improper payments or gifts to employees (including family members or friends), customers, or business partners.

- *Record Keeping:* All gifts and entertainment expenses must be documented accurately and transparently.
- *Proportionality:* Gifts and entertainment must not be excessive or used to gain undue influence or preferential treatment from customers, suppliers, or any other business partners.

## Business Property and Assets

ProChema values and protects its property, intellectual property, and resources, as well as those of third parties.

- *Protection of Assets:* Employees must protect, preserve, and secure ProChema's physical and intellectual property, using it solely for legitimate business purposes that benefit ProChema and its subsidiaries.
- *Responsible Use:* Company resources must be used responsibly, ensuring their use aligns with ProChema's goals and values.

## Confidentiality, Intellectual Property and Data Privacy Rules

ProChema ensures the protection of confidential and internal information, safeguarding it from unauthorized disclosure.

- *Third-Party Confidentiality:* ProChema respects the intellectual property and confidential information of third parties and ensures that it is only used as explicitly permitted by relevant agreements.
- *Data Privacy:* Personal data collected, processed, stored, or disclosed by ProChema must only be used for legitimate business purposes and in line with applicable agreements.
- *Data Protection:* We are committed to protecting the personal data of employees, suppliers, and customers, processing it only when necessary for business operations.
- *Cybersecurity Measures:* ProChema ensures the protection of personal and business data through advanced cybersecurity measures. We comply with the *EU General Data Protection Regulation (GDPR)* and provide regular cybersecurity training to employees to mitigate risks and ensure compliance.

## Accuracy of Records and Documentation

ProChema ensures transparency in financial transactions and documentation, complying with EU Anti-Money Laundering (AML) regulations.

- *Accurate Records:* All business transactions must be accurately documented, reflecting the true nature of the underlying activity.
- *Transparency:* Financial records must be complete and timely, ensuring compliance with all EU regulations.
- *Reporting Suspicious Activity:* Any suspicious financial activity must be reported immediately, in accordance with EU law.

## What to do when in doubt?

ProChema's Code of Business Conduct & Ethics provides a solid basis for the guidance of the employees. If employees have any doubts about the appropriate course of action, they should seek guidance from their direct supervisor.

## What to do when in awareness of violation of the Code?

Employees are required to report any violations of the Code immediately. Reports will be handled confidentially and anonymously, and employees can submit concerns to **compliance@prochema.com** without fear of retaliation.