Revision 01, Effective 11/2022



# **Code of Conduct**

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The code of conduct sets out the rules of conduct for all employees and business partners of ThoMar OHG. The management is committed to communicating and exemplifying the contents of the code of conduct and their significance for the respective work tasks to its employees and to continuously align and harmonise daily actions with the code of conduct.

## 1. Compliance with ethical principles

We practice and expect from our business partners and employees a healthy corporate culture characterised by respect, trust, honesty, and openness. These ethical principles and values must be upheld and communicated and implemented in our day-to-day business dealings with business partners and employees.

## 2. Dealing with business partners and third parties

## 2.1 Compliance with laws and internal policies

For ThoMar OHG, compliance with the law has top priority. All employees of ThoMar OHG undertake to observe the statutory provisions of those legal systems within the framework of which they act. Violations of the law must be avoided under all circumstances. The same applies to all applicable internal regulations adopted by the company.

## 2.2 Avoiding conflicts of interest

In our daily work, we may be faced with business-related decision situations in which the interests of the company conflict with our private or personal interests. Conflicts of interest can lead to decisions no longer being made objectively in the interests of the company. All employees of ThoMar OHG who are affected by a possible or actual conflict of interest undertake to inform their superiors or the management immediately to bring about a rapid clarification.

#### 2.3 Fair competition

In almost all countries, relationships and agreements with competitors, suppliers and distributors or trading companies that interfere with fair competition are prohibited by law. These include, but are not limited to, price fixing, sharing of customers or sales territories between competitors, anti-competitive boycotts, and other unfair methods of competition. Violations of any kind will be stopped immediately by ThoMar OHG.

## 2.4 Public appearance and communication

We respect the right to freedom of expression and the protection of personal rights and privacy. All employees should be aware that they can also be perceived as representatives of ThoMar OHG in their private lives and are therefore called upon to uphold the company's reputation through their behaviour and appearance in public.

## 3. Business conduct in a global context

We respect internationally recognised human rights and support their observance. We strictly reject any form of forced labour and child labour. We recognise the right of all employees to form trade unions and employee representatives on a democratic basis within the framework of national regulations. The right to adequate remuneration is recognised for all employees. Remuneration and other benefits are at least in line with the respective national and local legal standards or the level of the national economic sectors/industries and regions. We comply with all applicable sanctions and embargoes and categorically refuse to do business with the affected countries and listed individuals and companies.

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We will take all necessary measures to avoid the use of conflict materials in our products in order to prevent human rights violations, corruption and financing of armed groups or similar.

## 4. Handling corporate property and information

#### 4.1 Protection of corporate property

ThoMar OHG provides its employees with machines/equipment, IT, office, and communication equipment and much more to carry out their work. This company property is to be used properly, responsibly, carefully, and cost-consciously by the employees.

## 4.2 Confidentiality of information

Information about ThoMar OHG or business partners must always be treated confidentially and must not be passed on to unauthorised third parties. This confidentiality also applies beyond the termination of the employment or business relationship. The use of confidential information for personal gain is not permitted. The handling of personal data by the respective employees and business partners must be carried out responsibly and in compliance with the legal regulations. All violations or any suspicion of violations of these regulations must be reported immediately to the respective data protection officer.

#### 4.3 Transparent processes and truthful reporting

All processes comply with the requirements of ISO 9001 and shall be as transparent as possible to ensure the best possible controllability and verifiability and to make results traceable. All books, records, and reports to be kept are true and complete and comply with the rules and standards applicable to them. We also expect this from our business partners.

#### 5. Sustainable management as a value-driven philosophy

#### 5.1. Principles of sustainable management

We interpret sustainability as our duty towards present and future generations. All our actions are geared towards creating and maintaining a company that will last in the long term and for generations to come.

For us, sustainable management means that ecological, social, and economic concerns are in balance with each other. We treat natural resources, raw materials, and waste consciously and responsibly, and our relationships with consumers, customers, suppliers, employees, and investors are long-term.

In addition to observing ecological, social, and economic aspects, we also expect our business partners to comply with and continuously develop measures to enhance the concept of sustainability.

#### 5.2. Values

For us as ThoMar OHG, appreciation, speed, responsibility, and sustainability are the main topics we focus on in our daily actions.

Appreciation: We understand appreciation as the positive evaluation of another person. Appreciation received and given increases the self-esteem of both the receiver and the giver. Therefore, we treat other people in a positive and appreciative manner, regardless of whether they are employees, customers, suppliers, service providers or other parties.

Speed: To achieve customer satisfaction, speed is the basis for company stability and growth and is therefore an essential pillar of our value system. From the customer's point of view, the shortest possible delivery time

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is just as important as a short response time for quotes, order confirmations or simple open questions. That is why we act and react quickly to all customer concerns.

Responsibility: We are aware of our corporate and personal responsibility and voluntarily commit ourselves to take responsibility for the possible consequences of our daily actions, to be held accountable for them if necessary or to accept penalties.

Sustainability: As already stated in our principles of sustainable management, the idea of sustainability is an integral part of our corporate philosophy. Therefore, we use natural resources responsibly, maintain appreciative relationships with all parties we encounter in our daily work, and operate in a long-term and sustainable manner.

#### 5.3 Goals and vision

Our vision is to become the most sustainable desiccant supplier in Europe.

As a first milestone towards achieving this vision, we have set ourselves the goal of becoming a certified CO<sub>2</sub>-neutral company by our 25th anniversary on 01 May 2024.

#### 5.4 Mission

We are aware of our responsibility towards present and future generations and always strive to consider our daily decisions' and activities' potential impact on the environment and society.

To achieve our first goal on the road to sustainability, we continue to develop our daily awareness of where valuable resources are still being over-consumed and work together to find solutions to minimise waste.

Thomas Möller	Martin Möller	Daniel Schuback