



**KRYOLAN**  
PROFESSIONAL MAKE-UP

GROUP

CODE OF CONDUCT

*updated: September 2023*



## FOREWORD BY THE MANAGEMENT

Kryolan is a family-run company that puts interpersonal relationships at the heart of everything it does. The company operates internationally and deals with different cultures and local laws and regulations around the world. To be successful, Kryolan relies on being flexible and innovative in its use of resources and business development in different parts of the world.

Our aim is not only to respect economic and social priorities of the respective local environment, but also to comply with our own rules of conduct that apply to the entire Group. The way we conduct our business relationships with employees, customers, suppliers, competitors, neighbors, government officials and the public determine our reputation and is crucial to the long-term continuity of the Kryolan Group.

Our core norms and values shape the character of the Kryolan organization despite diverse economic and social systems. These norms and values are embodied in our publications on values as well as principles and goals on environmental protection and safety.

We strive to foster a culture of trust, mutual respect and openness inside and outside the company. In regions where necessary, local standards and laws complement our Code of Conduct.

We expect our employees to apply the highest standards of honesty and integrity in their daily business environment. Our Code of Conduct serves as an important guideline to guide decision-making processes in the Kryolan Group and to avoid conflicts of interest.

We encourage every employee to raise questions or concerns when they encounter conduct that is inconsistent with our Code. This responsibility is shared by everyone in our company. We recognize that the issues addressed in our Code are often complex and require courage to address. Please be assured that we will address your questions and concerns carefully, and note that retaliation is strictly prohibited.

Berlin, September 20, 2023



Wolfram Langer  
Chief Executive Officer



Sebastian Langer  
Managing Director



Dominik Langer  
Managing Director

*(In the following code, we have deliberately avoided using the gender for the sake of simplicity. However, everyone should feel that they are being addressed.)*

- 1. OUR CODE 7**
- 1.1 TO WHOM DOES OUR CODE APPLY? 7**
- 1.2 WHERE DO I GO TO EXPRESS MY OPINION? 7**
- 1.3 SUPERIORS MUST SET A GOOD EXAMPLE 8**
- 1.4 POLICY OF NON-RETALIATION 8**
- 2 EVERYONE BEARS THE RESPONSIBILITY 9**
- 3 RESPECT IN THE WORKPLACE 9**
- 3.1 INCLUSION AND DIVERSITY STRENGTHEN OUR COMPANY 9**
- 3.2 ZERO TOLERANCE FOR HARASSMENT 10**
- 3.3 REPORT OF HARASSMENT 10**
- 3.4 WE MEET THE REQUIREMENTS OF OUR CUSTOMERS 10**
- 3.6 WE OBSERVE LAWS AND SOCIAL NORMS 11**
- 3.7 WE TAKE RESPONSIBILITY FOR SAFETY, HEALTH AND THE ENVIRONMENT 11**
- 3.8 SOCIALLY RESPONSIBLE AND FAIR CONDUCT 12**
- 4 WE ARE COMMITTED TO ETHICAL BUSINESS PRACTICES 12**
- 4.1 WE EXCLUDE CONFLICTS OF INTEREST 12**
- 4.2 ZERO TOLERANCE FOR BRIBERY AND CORRUPTION 13**
- 4.3 MODEST GIFTS AND HOSPITALITY ARE PERMITTED 13**
- 4.4 LAWFUL DEALINGS WITH GOVERNMENT REPRESENTATIVES 14**
- 4.5 COMMUNICATION ABOUT OUR COMPANY'S OR COMPETITORS' PRODUCTS 14**
- 4.6 WITH ONE VOTE FOR OUR COMPANY 14**
- 4.7 WE RESPECT ANTI-BOYCOTT AND TRADE SANCTIONS LAWS 15**

<b>4.8</b>	<b><u>WE KEEP OUR PERSONAL POLITICAL ACTIVITIES AND CONTRIBUTIONS SEPARATE</u></b>	<b>15</b>
<b>5</b>	<b><u>WE SAFEGUARD OUR FINANCIAL INTEGRITY</u></b>	<b>15</b>
<b>5.1</b>	<b><u>ENSURING THE INTEGRITY OF OUR BOOKS, RECORDS AND FINANCIAL REPORTS</u></b>	<b>16</b>
<b>5.2</b>	<b><u>PREVENTION AND REPORTING OF FRAUDULENT ACTIVITIES</u></b>	<b>16</b>
<b>5.3</b>	<b><u>WE MAINTAIN ACCURATE BUSINESS RECORDS AND PRESERVE DATA INTEGRITY</u></b>	<b>16</b>
<b>6</b>	<b><u>WE PROTECT CONFIDENTIAL INFORMATION AND THE COMPANY'S ASSETS</u></b>	<b>17</b>
<b>6.1</b>	<b><u>RESPONSIBLE HANDLING OF THE COMPANY'S ASSETS</u></b>	<b>17</b>
<b>6.2</b>	<b><u>PROTECTING OUR BRANDS AND PRODUCTS FROM DIVERSION</u></b>	<b>18</b>
<b>6.3</b>	<b><u>PROTECTION OF PHYSICAL AND ELECTRONIC ASSETS</u></b>	<b>18</b>
<b>6.4</b>	<b><u>INTELLECTUAL PROPERTY PROTECTION</u></b>	<b>18</b>
<b>6.5</b>	<b><u>CAREFUL HANDLING OF CONFIDENTIAL INFORMATION</u></b>	<b>19</b>
<b>6.6</b>	<b><u>RESPECT FOR THE PRIVACY OF EMPLOYEES AND CONSUMERS</u></b>	<b>19</b>
<b>6.7</b>	<b><u>RESPONSIBLE COMMUNICATION IN SOCIAL MEDIA AND OTHER ELECTRONIC MEDIA</u></b>	<b>20</b>



## I . OUR CODE

Kryolan's business entails that we come into contact with many different people and organizations. In doing so, it is important that our employees respect local customs, traditions and social values, and respect the rights of every person to live a free and fulfilling life. The responsibility for appropriate behavior ultimately lies with each and every one of us.

Personal integrity and sound judgment are invaluable.

In difficult situations, employees should ask themselves the following questions:

- Is my action or decision appropriate and free from personal conflicts of interest?
- Can my action or decision withstand critical public scrutiny?
- Does my action or decision help maintain Kryolan's reputation as an ethical company?

If you can answer "yes" to these questions, your action or decision is likely to be consistent with the following rules of conduct.

We expect all employees and facilities to work together respectfully and openly. Teamwork is encouraged, and successes as well as failures should be shared. We should strive to value the ideas of others and acknowledge their contributions. Generous listening and sharing of information are important, while respecting the group's confidentiality rules.

Lack of respect, especially through offensive remarks, inappropriate gestures or racist, discriminatory or sexual remarks, is unacceptable. Disparagement of colleagues also violates Kryolan's ethical principles.

### I . I TO WHOM DOES OUR CODE APPLY?

Our Code of Conduct is binding on all members of management, all executives and all employees of the Kryolan Group worldwide. Each of us is committed to meeting the expectations and obligations set forth in this Code. All levels are expected to operate with integrity and provide appropriate guidance and support to employees.

It is important for all of us to ensure that we understand and comply with the standards set forth in our Code of Conduct, as well as all relevant local laws and Kryolan policies. Failure to read the Code of Conduct or sign appropriate acknowledgements does not relieve us of our obligation to comply with this Code.

### I . 2 WHERE DO I GO TO EXPRESS MY OPINION?

It is our own decision whether to discuss such violations with our supervisors or the Human Resources Office. We all have a responsibility to conduct our business in a proper manner. If you ever have questions or concerns about conduct that may not be in compliance with the law, our Code of Conduct or Company policies, we expect you to address these issues immediately. This is a responsible action and gives our company the opportunity to resolve the issue appropriately.

Your questions or concerns will be taken seriously and treated confidentially as far as possible. We understand that it often takes courage to speak up. Therefore, we also accept questions and concerns on an anonymous basis, provided this is permitted by law.

The following resources are available for you to ask questions and raise concerns:

1. Your manager or supervisor
2. human resources
3. the whistleblower system: [whistleblower.kryolan.com](https://whistleblower.kryolan.com)

If you are unsure about how to act or how best to report an issue, you can always contact our compliance team anonymously via the whistleblower page and ask for advice.

### I .3 SUPERIORS MUST SET A GOOD EXAMPLE

If you manage or supervise employees, you have an increased responsibility to lead by example and ensure that our company's values, code and policies are followed. This responsibility includes ensuring that your teams receive sufficient information, guidance and support to comply with our Code.

We expect you to:

1. "Make fair and objective business decisions:" Your decisions should be fair and objective, with no personal conflicts of interest.
2. Ensure understanding: Make sure your team understands our Code and company policies.
3. be a role model: As a supervisor, you should be a role model and demonstrate behavior consistent with our Code.
4. Create an open communication climate: Create an environment where employees feel comfortable expressing their opinions without fear of retaliation.
5. Recognize ethical behavior: Recognize and reward ethical behavior.
6. take questions and concerns seriously: take questions and concerns seriously and forward them promptly to the appropriate parties.
7. consistent handling of violations: Ensure that violations of the Code and policies are handled consistently and referred to the appropriate parties in a timely manner.

### I .4 POLICY OF NON-RETALIATION

We do not tolerate retaliation against anyone who, in good faith, asks questions or raises concerns about possible violations of law, our Code of Conduct or Company policy, or assists in the investigation of reported violations. Retaliation in any form is considered a material violation of our Code of Conduct and is strictly prohibited. Any retaliation or potential retaliation should be

reported immediately. Disciplinary action, including possible termination of employment, will be taken against anyone found to have retaliated against an individual.

## 2 EVERYONE BEARS THE RESPONSIBILITY

Everyone subject to our Code is expected to conduct business with unwavering ethics and integrity and to comply with the laws and regulations of the countries in which we operate. This commitment includes:

- Recognizing that one's actions, even in absentia, can have an impact on our company, reputation and brands. Our employees are asked to meet high standards and to ensure that their conduct does not adversely affect the company's ability to operate or its business.
- Understanding of applicable laws, policies and procedures.
- To cooperate fully in corporate investigations, while maintaining the confidentiality of such investigations.

If you ever find yourself in a situation where you are unsure how to act, ask yourself the following questions:

- Is the proposed behavior legal?
- Is the behavior ethical?
- Is the behavior consistent with our Code?
- Do I have the assurance that my behavior would not affect my own reputation or the reputation of our company if it became public knowledge?

If you are unsure or answer no to any of the above questions, it is advisable to preferably seek assistance before proceeding.

## 3 RESPECT IN THE WORKPLACE

The long-lasting success of our company depends on a safe and fair workplace where all employees can give their best. This includes the advertising of vacancies, the hiring process, remuneration, interaction with each other and the promotion of our employees. We are committed to complying with all relevant laws and regulations in the process.

Our efforts are focused on creating a work environment characterized by mutual respect, support and teamwork. We value an environment that fosters open communication, continuous development and diversity. These elements form the cornerstones of our success, both in the present and in the future.

### 3.1 INCLUSION AND DIVERSITY STRENGTHEN OUR COMPANY

Equal employment opportunity prevails at our company. Our hiring decisions are based solely on the merits, qualifications and performance of applicants. Any form of discrimination based on ethnicity, religion, color, sex, age, national origin, immigration status or citizenship, sexual

orientation, gender identity or expression, marital status, disability, genetic information, veteran or military status, domestic violence victim status, or any other characteristic protected by law is firmly and strictly prohibited.

### 3.2 ZERO TOLERANCE FOR HARASSMENT

Our Company fosters a work environment characterized by mutual respect, and we have a strict policy against conduct that could constitute or contribute to harassment based on protected characteristics. These protected characteristics include race, color, religion, national origin, ancestry, citizenship, age, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, protected medical condition, genetic information or other characteristics protected by applicable law.

We expect our employees as well as our customers, service providers and suppliers to recognize and comply with these principles.

### 3.3 REPORT OF HARASSMENT

If you believe you have been the victim of improper conduct, we strongly expect you to report your concerns immediately to your supervisors or, if necessary, directly to management. Similarly, individuals who have knowledge of inappropriate conduct toward others are required to share the appropriate information immediately.

Our supervisors have the responsibility to report all incidents of improper conduct, whether or not the individual involved is directly under their direction.

Prompt reporting is critical because it allows our company to take appropriate action to stop inappropriate behavior before it happens again.

If you wish to remain anonymous for confidentiality reasons, our whistleblower portal is available to you: [whistleblower.kryolan.com](https://whistleblower.kryolan.com).

All reports received are investigated in a timely manner, and we always strive to keep the identity of reporters as confidential as possible in accordance with applicable privacy laws.

Any employee who violates this policy will be subject to disciplinary action, up to and including termination of employment.

### 3.4 WE MEET THE REQUIREMENTS OF OUR CUSTOMERS

Customer satisfaction is the foundation of our business. We listen carefully to our customers' needs, respond quickly to their requirements, anticipate future needs, and provide outstanding value at fair prices. At Kryolan, we refuse to gain an unfair advantage over our customers by offering improper gifts, perks, entertainment or monetary amounts.

We guarantee:

- Compliance with all national and international legal and regulatory requirements to ensure the conformity of our products.
- Maintaining the highest standards of hygiene and strict quality controls at all stages, from product development to the manufacturing and distribution process.
- In the event of a customer complaint or potential health or safety risk, we ask the customer to immediately contact our appropriate key accounts or consumer departments.

### 3.5 WE DEMAND IMPECCABLE BUSINESS CONDUCT FROM OUR SUPPLIERS AND SERVICE PROVIDERS

We maintain global business relationships with suppliers and service providers who act in accordance with our ethical principles. In particular, we set high expectations for their capabilities in terms of quality, cost, innovation and reliability, as enshrined in our Supplier Code.

At the same time, we strive to be an attractive customer and strive for fair and reliable business relationships that benefit both parties.

Our decisions are based solely on sound business considerations, and we do not tolerate any undue influence that may lead to supplier exclusion.

The granting or acceptance of personal benefits is not permitted in our business relationships.

### 3.6 WE OBSERVE LAWS AND SOCIAL NORMS

Compliance with applicable laws and social standards is a critical component of our corporate ethics. Due to our international business activities, we are confronted with a large number of complex regulations and requirements. It is therefore of great importance that all employees understand the laws and standards relevant to their respective areas of responsibility.

Violation of these laws and standards could cause serious damage to Kryolan's reputation. In addition, each employee should be given the opportunity to engage in public affairs, provided that such engagement is appropriate in light of local conditions and is done after approval by local management.

### 3.7 WE TAKE RESPONSIBILITY FOR SAFETY, HEALTH AND THE ENVIRONMENT

The Kryolan Group continuously strives to improve its performance in the areas of safety, health and environmental protection. This is in line with our commitment to contribute to sustainable development. We treat these issues as importantly as other critical business areas by setting clear targets for improvement and regularly measuring and evaluating our performance.

We go beyond compliance with applicable laws and regulations and are permanently committed to achieving improvements in the key areas of our products, manufacturing and occupational safety.

### 3.8 SOCIALLY RESPONSIBLE AND FAIR CONDUCT

We are committed to always acting with the highest ethics and integrity in our interactions with customers, suppliers, competitors, employees and independent contractors of our company. We avoid taking unfair advantage or engaging in unethical business practices. This includes actions such as manipulation, concealment, misuse of privileged information, and misrepresentation of material facts or intentional acts or omissions intended to deceive others or gain an advantage for our company. We expect a comparable level of fairness and ethical behavior from our business partners, service providers and suppliers.

We place great importance on ensuring that our employees, business partners, service providers and suppliers comply with all applicable laws, including, in particular, labor laws relating to issues such as child labor, minimum wages, overtime pay, hiring and occupational safety.

## 4 WE ARE COMMITTED TO ETHICAL BUSINESS PRACTICES

The Kryolan Group supports the market economy system. Within the applicable competition laws, we strive to promote fair competition. We do not hinder the free competition of others and do not make false or misleading representations in comparison with competitors.

### 4.1 WE EXCLUDE CONFLICTS OF INTEREST

Employees must avoid any situation that could lead to a conflict of interest between their personal interests and the interests of the company. When interacting with existing or potential customers, suppliers, contractors and competitors, they must always act in the best interests of Kryolan and exclude personal gain.

Doing business with relatives or former employees is strictly prohibited and considered a conflict of interest. Should a potential conflict arise, it is your duty to report the matter to your supervisor.

Conflicts of interest may arise when your personal interests or activities:

- Improperly influence your judgment when acting on behalf of our company;
- cause you to compete with our company or divert business or assets from our company;
- impair the efficiency, effectiveness or objectivity with which you perform your duties;
- result in you receiving improper personal benefits because of your position in our company.

Here are some examples of conflicts of interest and guidance on each topic:

- **Work outside the Company:** If you perform additional work outside the Company, whether paid or unpaid, you must disclose this to your supervisor. It is important to ensure that your work outside the Company does not conflict with your duties or use Company time,

information or resources. Working for the Company's competitors or engaging in business activities that could potentially compete with the Company is strictly prohibited.

- **Community Service Activities:** We welcome your participation in charitable activities, but they must not conflict with your job duties or negatively impact the Company's reputation. You should not use your position with the Company to solicit donations for charitable causes or create the impression that the Company officially supports your personal charitable activities without first obtaining approval.
- **Close personal relationships:** Conflicts of interest may arise from close personal relationships between employees, employees and temporary workers, employees and business partners (including independent contractors), or employees and competitors. Such relationships may include family connections, romantic relationships, existing business relationships or people in your household. You are required to disclose such relationships to your supervisor and Human Resources.
- **Supervisor Influence:** A supervisor may not directly or indirectly influence the salary, promotion, performance evaluation, work assignments or other terms and conditions of employment of an employee or independent contractor with whom a close personal relationship exists. Supervisors involved in such relationships have a special responsibility to discuss the matter confidentially with their own supervisor or Human Resources. A supervisor's failure to report such a relationship is considered a serious error in workplace conduct and may result in disciplinary action, up to and including termination of employment.

## 4.2 ZERO TOLERANCE FOR BRIBERY AND CORRUPTION

We condemn bribery and corrupt behavior in any form, as it is not only harmful to the communities in which we operate, but also violates anti-bribery and corruption laws in the countries where we do business. No person, whether natural or legal, representing our company may offer, promise, give or receive (directly or indirectly) money or anything of value to obtain a business favor, favorable decision or advantage.

It is a violation of our Code to offer or provide anything of value to facilitate official proceedings or to influence a government official. Such items of value include gifts, entertainment, charitable donations and employment opportunities. If you are unsure whether a gift, transaction or other arrangement violates Company policy or the law, you should contact management.

Anyone who has knowledge of conduct that may violate this Anti-Bribery and Corruption Code is required to report the matter immediately.

## 4.3 MODEST GIFTS AND HOSPITALITY ARE PERMITTED

Modest gifts and entertainment that serve legitimate business purposes may be part of maintaining positive business relationships. However, they must be given and accepted in a manner that ensures fairness, honesty and objectivity in our business relationships and avoids conflicts of interest or the appearance of conflicts of interest.

As a general rule, gifts should be in the form of Company products. Cash or its equivalent (such as gift cards), loans, guarantees or offers of work should never be given or accepted as gifts. It is advisable to avoid gifts, entertainment or favors that might create the impression of a personal

obligation. No employee, officer, director or their family members may accept or make gifts from a competitor.

When deciding whether giving or accepting a gift is permissible and appropriate, consider the following factors:

- Will the gift be presented on an unusual occasion?
- Is the gift excessive?
- Are gifts given on a regular basis?
- Could the gift affect the objectivity of the company?
- Would the gift result in someone receiving an improper personal benefit because of their position?
- Would public disclosure of the gift damage your reputation, the company's reputation or the family's reputation?

If you can answer "yes" to any of the above questions, you should contact management before accepting or giving the gift.

#### 4.4 LAWFUL DEALINGS WITH GOVERNMENT REPRESENTATIVES

We are committed to complying with local laws and regulations in the communities in which we operate and to working fairly and honestly with government officials and others. If a representative of a government or regulatory agency contacts you for non-routine information or to conduct an inspection, you must notify your supervisor immediately. This applies even if you are unsure whether the person is a government official.

#### 4.5 COMMUNICATION ABOUT OUR COMPANY'S OR COMPETITORS' PRODUCTS

You may not participate in any misleading or false advertising, promotion or other communication about products or product-related policies, whether from our company or our competitors.

When talking about brands or products, whether from our company or other companies in our industry, you must always make it clear that you work for or act on behalf of our company. You may not make specific claims about product performance or product-related policies unless they have been specifically approved by the Company.

Even if you make such communications in a well-intentioned manner, they may be considered false or misleading, whether or not the person making the statement is identified as a Company employee.

#### 4.6 WITH ONE VOTE FOR OUR COMPANY

You are not permitted to speak on behalf of our Company without first consulting with a member of management. You should not share confidential or sensitive information, intellectual property,

financial matters, earnings estimates or market assessments regarding our Company with any outsider, including financial or investment professionals, without the express permission of management.

Prior to any actions involving interviews, outside presentations, photographs, films, gifts or information about our company or products requested by media representatives, journalists, authors, PR agencies or other companies (such as suppliers and retailers), you should contact the management or the responsible communications officer. It is not permitted to have "off-the-record" conversations about our company with media representatives.

Government agencies and other regulatory authorities may from time to time attempt to contact you to obtain information about our business. We will cooperate with government or regulatory inquiries or investigations and expect that you will notify management before responding to ensure that we respond in accordance with applicable laws. However, notifying management of government inquiries or investigations should not be construed as limiting your right to communicate with a government agency, participate in a government investigation, or file a charge or complaint with a government agency without our Company's authorization or notification.

#### 4.7 WE RESPECT ANTI-BOYCOTT AND TRADE SANCTIONS LAWS

We respect and comply with international trade laws and regulations, including export controls, import regulations, economic sanctions and anti-boycott laws, in all countries where we do business. These international trade laws govern cross-border trade in goods and services and contain provisions that prevent or restrict trade with sanctioned parties and/or countries.

#### 4.8 WE KEEP OUR PERSONAL POLITICAL ACTIVITIES AND CONTRIBUTIONS SEPARATE

You have the right to volunteer your personal time and money to support candidates, political parties and civic organizations that you care about. However, you are strictly prohibited from using or donating Company funds or assets to political parties, candidates or election campaigns unless such activity is permitted by law and has been approved in writing in advance by management.

### 5 WE SAFEGUARD OUR FINANCIAL INTEGRITY

We place great emphasis on safeguarding our financial integrity. Our financial affairs are managed according to the highest standards of accounting and transparency. We are committed to complying with all applicable financial rules, laws and regulations.

Our employees are required to handle the company's financial resources responsibly and to document all financial transactions correctly and carefully. We focus on transparency and accuracy in our financial reporting.

Any suspicion of financial irregularities or fraud is carefully investigated and appropriate measures are taken to protect the financial integrity of the Company.

Our financial integrity is an essential part of our corporate culture, and we expect all employees to be aware of and respect this commitment.

## 5.1 ENSURING THE INTEGRITY OF OUR BOOKS, RECORDS AND FINANCIAL REPORTS

Our company has a legal obligation to publish important information about our business activities. In publishing such information, we have a responsibility to do so in a fair, complete, accurate, timely and understandable manner.

We are also required by law to maintain honest and accurate financial records. Regulators and other stakeholders rely on our financial information to be truthful, comprehensive and timely.

We must maintain accurate records, including legal documents, to ensure the integrity of our financial reporting. Our employees are prohibited from:

- Provide false, misleading or incomplete information in connection with audits of our company or filings with governmental agencies or other governmental entities.
- Influence, harass or deceive our Company's independent auditors who are engaged to audit or review our financial statements.
- Employees, officers or members of management are prohibited from engaging our Company's independent auditors for personal services.

## 5.2 PREVENTION AND REPORTING OF FRAUDULENT ACTIVITIES

Your role in preventing and detecting fraudulent activity is critical. Fraud or fraudulent activity can take several forms, including:

- Keeping inaccurate books and records.
- Misrepresenting or concealing material events, transactions or information.
- Misrepresentation of financial matters.
- The falsification or manipulation of accounting records or documents.
- The misappropriation of company property or employee time.

If you encounter possible fraudulent activity while on the job, you are required to report it to management immediately.

## 5.3 WE MAINTAIN ACCURATE BUSINESS RECORDS AND PRESERVE DATA INTEGRITY

Employees, officers, and members of management have the responsibility to retain files and records in paper and electronic form in accordance with the records management policy established retention periods.

If a hold has been placed on certain documents, records or information, they must be retained until the hold is lifted, unless the required retention period is longer.

Ensuring data integrity in our business records is critical, particularly with respect to manufacturing, documentation and distribution, to ensure the quality, safety and regulatory compliance of our products. Data integrity means that data is complete, consistent, accurate, trustworthy, reliable, and fit for its intended purpose in operations, decision making, and planning.

Data integrity management, retention, and assurance requirements apply to both paper and electronic records, which must be retained throughout the product lifecycle.

## 6 WE PROTECT CONFIDENTIAL INFORMATION AND THE COMPANY'S ASSETS

The disclosure of confidential internal information, such as business strategies, formulations or laboratory results, to unauthorized persons inside or outside the company is strictly prohibited without express permission.

Non-publicly disclosed information received by an employee as a result of his or her affiliation with the Company may not be used for the personal gain of the employee or a related party. It is important to keep this information confidential and not to use it for personal or unlawful purposes.

Each employee is responsible for protecting Kryolan's rights and property, both tangible and intangible. This includes technology, trade secrets and other proprietary information protected by law. We are all required to implement effective controls to protect Kryolan's intellectual and tangible property from loss, unauthorized use or misuse. If you become aware that someone is violating this policy, you should first contact the person directly. If you are unsure, you may contact your supervisor or management for guidance.

### 6.1 RESPONSIBLE HANDLING OF THE COMPANY'S ASSETS

Our company's assets are critical to our success, and it is of utmost importance that they are used only for legitimate and approved business purposes. These assets include financial resources, technological resources such as laptops or copiers, proprietary information, physical assets such as products, and intangible assets such as our intellectual property.

It is critical that all employees use the Company's assets carefully and responsibly and ensure that they are not used for personal purposes or unlawful activities. This not only protects the interests of the company, but also ensures compliance with all applicable laws and regulations.

If you are unsure whether the use of an asset for a particular purpose is legal or authorized, you should contact your supervisor or management for clarity. Proper use and protection of our assets are critical to the long-term success of our business.

## 6.2 PROTECTING OUR BRANDS AND PRODUCTS FROM DIVERSION

Protecting our brands and products from diversion is paramount to our long-term success. Diversion occurs when our products are sold in a manner that does not comply with our company policies, or when they are stolen and sold by unauthorized individuals, stores, e-commerce websites or other sales channels without our company's permission.

Every employee has a responsibility to protect our brands from diversion, as this can jeopardize the value and reputation of our brands, harm our relationships with authorized trading partners and negatively impact brand equity.

It is important to be vigilant and ensure that sales limits are met, requests for excess quantities are responded to appropriately, products are properly coded, justifications for abnormal business growth are reviewed, suspicious accounts are monitored, and questions or concerns are brought to your manager or supervisor in a timely manner.

These are critical steps to protect our brands and products from diversion and ensure they are sold properly and according to our policies.

## 6.3 PROTECTION OF PHYSICAL AND ELECTRONIC ASSETS

We expect all employees to use the Company's IT systems, applications, hardware and networks (collectively, "networks") only for legitimate business purposes and in accordance with applicable laws and Company policies. These networks are the property of the Company and may only be used by authorized users, which include employees and consultants, for legitimate business purposes.

Failure to comply with authorized use of the networks may result in disciplinary and/or legal action. The Company reserves the right to monitor the use of its networks in accordance with applicable law and Company policy. This may include reviewing emails, chat logs and other messages, as well as files, documents, information and data sent, received or stored over the networks. Deleted messages and files can also be monitored if they can be extracted from internal storage.

It is strictly prohibited to use recording devices of any kind to make recordings of, or take pictures of, Company activities, facilities or assets, or conversations relating to the Company without the express permission of a manager or higher supervisor. Recording devices include tape recorders, video recorders, cell phone recorders, cameras and cell phone cameras. There are only a few exceptions for legitimate business purposes that have been specifically authorized by a manager or higher supervisor.

## 6.4 INTELLECTUAL PROPERTY PROTECTION

Protecting the intellectual property of our brands and products is critical to maintaining our competitive advantage. We expect all employees to carefully protect our intellectual property, which includes trademarks, copyrights, trade secrets, discoveries, ideas, improvements, know-how, manufacturing processes and patents.

Intellectual property also includes anything created or otherwise developed as a result of the use of our Company's business information, work time, facilities or assets in the course of doing business for our Company.

It is of the utmost importance to respect the intellectual property of others and not to engage in any unauthorized use, theft or misappropriation of competitors' or third parties' intellectual property. These actions may result in significant legal consequences for the Company and for you personally, including fines, lawsuits, injunctions or criminal penalties.

If you have any questions or concerns related to intellectual property, please contact management.

## 6.5 CAREFUL HANDLING OF CONFIDENTIAL INFORMATION

Protecting our Company's confidential information is critical because it affects our ability to successfully conduct business, grow and compete. In the course of your job, employees may have access to private, non-public information about our company or third parties with whom we do business. This confidential information may include personal data, financial information, proprietary information, strategic plans, product innovations, marketing strategies, sales forecasts and other valuable business information.

To ensure the confidentiality of this information, the following guidelines must be followed:

- **No Disclosure to Third Parties:** Do not disclose confidential information to anyone outside our company unless specifically authorized by management or under a binding non-disclosure agreement that has been reviewed and approved by the Business Department. This includes incidental disclosures in public conversations or on social media platforms.
- **Restricted Use:** Use confidential information only for the purposes for which it was provided and in the course of your professional duties.
- **Internal sharing:** Share confidential information within our company only with people who need to know and are aware of the confidentiality of the information.
- **Reporting Breaches:** Promptly notify your supervisor if you learn of any intentional or unintentional improper disclosure of confidential information.
- **Follow security procedures:** Ensure that all access points to our IT systems are password protected and follow security procedures.

## 6.6 RESPECT FOR THE PRIVACY OF EMPLOYEES AND CONSUMERS

Protecting personal information is critical to maintaining the privacy of our employees and all individuals with whom we do business. Personal data is information that can identify or be associated with an individual person. This may include names, contact information, dates of birth, health information, biometric data, identification data, photographs, usernames, IP addresses, purchase history, payment card information, and more.

The following data protection principles must be observed with regard to personal data:

- **Targeted data collection and use:** Collect, use and store personal data only for the specific business purposes for which it is needed. Access to such data should be limited on a need-to-know basis.

- Notification and choice: Provide individuals with adequate notice about how their personal information will be collected, used, and shared. Where possible, offer data subjects choices about how their information is used, such as the ability to opt out of marketing emails.
- Protection of personal information: Ensure that personal information is adequately protected. This may include locking computers and mobile devices, shredding printed documents, and keeping passwords secret.
- Maintain data integrity: Keep personal data accurate, complete, and up-to-date.
- If you suspect the loss, theft, or unauthorized access, use, or disclosure of personal data, including such data on Kryolan-owned devices or laptops, it is critical that you report it immediately to your EDP department, supervisor, or management.

These measures are important to ensure that personal data is protected in accordance with applicable data protection rules and regulations and that the privacy of data subjects is preserved.

## 6.7 RESPONSIBLE COMMUNICATION IN SOCIAL MEDIA AND OTHER ELECTRONIC MEDIA

Social media use is prevalent in today's business world, and it is important to ensure that it is used in a manner consistent with company values. The following are some guidelines for the use of social media:

- Courtesy and respect: Be courteous and respectful in your communications on social media. Remember that your interactions can impact how others perceive your company and your values.
- Professional communication: In business communications via social media, both the form and content of your messages should be professional and precise, regardless of whether they are addressed to employees or third parties.
- Privacy and Confidentiality: Ensure that messages and information are directed only to the intended recipients. Avoid inappropriate disclosure of confidential or personal information.
- Legal compliance: Note that nothing in company policies should be interpreted to prevent employees from engaging in activities protected by applicable laws. It is important to comply with applicable laws and regulations regarding the use of social media.

Proper use of social media can help protect our company's reputation and build positive relationships with customers, colleagues and other stakeholders.

Follow these guidelines to ensure that your social media activities are consistent with our company's values and legal requirements.





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