

Code of Conduct

Preamble

Claus Nitsche & Sohn GmbH, hereafter referred to as **nitsche**, is a medium-sized company and has been part of the OQEMA Group since the end of 2020. For over 60 years, we have been trading a wide range of essential oils and aroma chemicals for the fragrance, flavour and chemical industries.

Compliance with strict laws and responsible and fair business practices are top priorities for our company and are an integral part of our corporate values.

Sustainability is a core value at **nitsche**. It underpins our strategic orientation and informs our approach to business. We are committed to complying with internationally recognised human rights and social standards throughout our supply chain. Our business partners are essential to our success. A shared commitment to ethical and sustainable behaviour is the basis for successful collaboration. Compliance with the requirements and principles set out in this Code of Conduct for Business Partners is a fundamental part of our cooperation.

The social and environmental standards and processes described here are based on the ten principles of the United Nations Global Compact, the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

These regulations serve to implement the German "Lieferkettensorgfaltspflichtengesetz" and other comparable regulations.

The requirements and principles of this Code of Conduct form an integral part of the contractual obligations and cooperation between our business partners and **nitsche**. Our business partners therefore undertake to comply with and promote the following principles of this Code of Conduct and to train their employees regularly and appropriately in this regard. Furthermore, these contents also apply to suppliers and other third parties that our business partners use to fulfil contracts. Business partners must therefore integrate the provisions of this Code of Conduct into their own contracts. We expect them to oblige their suppliers and other third parties accordingly.

We are aware that the legal and cultural requirements in individual countries, business areas or markets may differ. Should stricter regulations apply in individual countries, business areas or markets than those set out in this Code of Conduct, the stricter regulations shall apply. For the purposes of this Code of Conduct, business partners are defined as all third parties acting on behalf of, or in collaboration with, **nitsche**. This encompasses, but is not limited to, suppliers, subcontractors, consultants, brokers, agents, commercial representatives, distributors, contractors and freelancers. As national and international regulations evolve rapidly, we reserve the right to amend this Code of Conduct in line with changes to relevant standards and regulations. In the event of a change to the Code of Conduct, **nitsche** will inform the relevant business partner in an appropriate manner.

Principle of legality

nitsche adheres to the principle of strict legality in all actions, measures, contracts and other processes of **nitsche**. Compliance with the principle of legality encompasses a number of key areas, including the timely payment of taxes and customs duties, adherence to competition and antitrust legislation, the prevention of corruption and money laundering, the acquisition of official permits, the observance of export control regulations and the respect for the legal interests of third parties. This also applies to the development and manufacture of products and the provision of services.

Consequently, we require our business partners to comply with all applicable laws, the fundamental principles of the United Nations Global Compact and this Code of Conduct in the course of their business activities with **nitsche**. Furthermore, we expect them to work towards compliance with this Code of Conduct by third parties engaged to fulfil contracts with **nitsche**.

Dealing with employees

Our business partners comply with basic labour rights in accordance with the relevant national legislation. The following principles are based on the fundamental principles of the International Labour Organization (ILO).

Human rights

Our business partners comply with internationally recognised human rights and actively promote their observance. The United Nations Guiding Principles on Business and Human Rights provide the foundation for this.

Child labour

Our business partners only employ individuals who have reached the minimum age required to perform the work in accordance with the applicable national legislation. Furthermore, they respect and observe the rights of children. In accordance with ILO Conventions No. 158 on the minimum age for employment and No. 182 on the elimination of the worst forms of child labour, our business partners must observe these standards.

Forced labour

Our business partners adhere to the principle of zero tolerance for forced labour, including human trafficking, torture and any form of slavery or forced labour. They also respect the right of employees to freely choose their employment.

Freedom of association

Our business partners respect the freedom of association and the right to form interest groups. They grant their employees the right to represent their interests on the basis of ILO legislation. In accordance with the relevant legislation and in line with ILO Convention No. 98, our business partners uphold the right to collective bargaining and the right to strike.

Equal opportunities

Our business partners do not tolerate discrimination against employees on the basis of skin colour, ethnic origin, gender, age, nationality, social background, disability, sexual orientation, religion or ideology. This also applies to any form of harassment. In the event that the requirements and tasks are comparable, the principle of equal pay for work of equal value must be applied, regardless of gender differences. The ILO conventions must be observed.

Fair Working Conditions

Our business partners are committed to ensuring that all employees are treated fairly and in accordance with the relevant ILO conventions. Our business partners ensure that remuneration and social benefits are paid in accordance with national and local laws, regulations or agreements. Our business partners comply with all applicable working time and vacation regulations.

Health and safety in the workplace

As a minimum, our business partners must comply with the applicable regulations for a safe and hygienic working environment and undertake to take appropriate measures to ensure health and safety in the workplace in order to guarantee healthy working conditions.

Protection from eviction and land confiscation

Our business partners are committed to ensuring that no unlawful evictions are carried out. They also undertake not to unlawfully take land, forests and water through acquisition, development or other use.

Use of private or public security forces

In the event that there is a risk of torture, cruel, inhuman or degrading treatment, injury to life and limb or impairment of freedom of association and trade union freedom due to an instruction or control block by the company, our business partners undertake not to employ or deploy private or public security forces.

Protecting the environment

Our business partners are committed to avoiding risks to people and the environment, minimising environmental pollution and using resources sparingly.

The processes, operating sites and resources of our business partners comply with all applicable legal requirements and standards for fire and environmental protection.

Protecting the climate

We expect our business partners to be committed to sustainable and active climate protection, for example by increasing energy efficiency or generating or purchasing energy from renewable sources.

Water Consumption and Quality

Our business partners are committed to the careful use of water. In areas where water is scarce, it is of the utmost importance to minimise water extraction and guarantee access to drinking water and sanitary facilities. It is essential that the quality standards for wastewater are defined and monitored in accordance with the applicable legal and official requirements.

Air quality and soil quality

Our business partners are required to comply with the relevant legal provisions and the requirements of the local authorities.

Materials and disposal

It is our expectation that our business partners will minimise the impact of their business activities on the environment and use resources sparingly. Wherever possible, materials are reused. In the event of waste, our business partners adhere to the principle of "avoidance before disposal". Our business partners are required to comply with all relevant statutory regulations and official requirements.

Business relations

Avoidance of conflicts of interest

Our business partners make their decisions on the basis of objective considerations and are not inappropriately guided by personal interests. In the event that our business partners become aware of a potential conflict of interest in connection with our company, they will inform **nitsche** immediately.

Free competition

Our business partners compete fairly and adhere to the applicable statutory provisions for the protection of free competition. Furthermore, they do not enter into any agreements or concerted practices with other companies that have the purpose or effect of preventing, restricting or distorting competition within the meaning of applicable antitrust law. They also do not illegally exploit any dominant market position.

Anti-Corruption

It is the responsibility of our business partners to ensure compliance with the applicable anti-corruption regulations. In particular, our business partners must ensure that their employees, subcontractors or agents do not offer, promise or grant any advantages to **nitsche** employees in order to obtain a contract or other preferential treatment in business transactions. These principles also apply when our business partners work with other third parties in connection with their activities for **nitsche**.

It is our policy that our business partners shall not make any payments or provide any other benefits to any person, company or public office with the intention of influencing the decision-making processes of the beneficiary or a third party, regardless of whether this is in breach of any applicable laws and regulations. Our business partners only make contributions in connection with advertising measures, donations and sponsoring within the scope of what is legally permissible and customary.

Furthermore, our business partners will never offer, grant, demand or accept illegal payments such as bribes, kickbacks or other benefits for the realisation of business or in connection with the business relationship.

Trade secrets

In working with our customers and business partners, we frequently gain insight into confidential know-how, ideas, concepts and plans. This trust associated with this is an essential business basis for **nitsche**. It also applies to our own internal information from or about **nitsche**, such as new product developments, business ideas or business documents. It is therefore of the utmost importance to us that information is handled in a confidential manner. This is why we also require our business partners to maintain confidentiality.

It is the responsibility of our business partners to ensure that confidential information from or about **nitsche** is kept secret and that intellectual property is protected. This obligation also extends to the termination of the business relationship.

Furthermore, our business partners adhere to all applicable data protection regulations and utilise third-party software (including open-source software and company software) only within the scope of the rights granted and in accordance with the respective licence terms.

Money laundering

Our business partners are fully compliant with all relevant legal provisions for the prevention of money laundering.

Customs and export control regulations, sanctions

Our business partners are aware of and comply with international customs and export control regulations, as well as sanctions. They also ensure the proactive exchange of information relevant to foreign trade with the aim of ensuring a secure supply chain.

Our business partners comply with the relevant regulations on sanctions and embargoes, as well as those on the transportation of goods, technologies, services and information and on the financing of terrorist attacks.

Data protection and data security

Our business partners are required to guarantee the right to informational self-determination, the protection of personal data and the security of business information and personal data in all business processes in compliance with legal requirements and the applicable data protection and information security laws.

IT security

Electronic data processing systems are an essential component of our business operations. Any manipulation or disruption of these systems can have serious consequences, such as data loss, theft of personal data or copyright infringements. **nitsche** has therefore implemented appropriate measures and issued regulations to ensure the confidentiality, integrity and availability of electronically stored information.

We expect our business partners to implement appropriate security measures to protect electronically stored information. In particular, they implement all necessary measures to prevent the misuse or threat of sensitive information, whether internal or external.

Complaints system

All employees at **nitsche** are required to report any suspected cases or violations of this Code of Conduct. This helps to prevent similar misconduct in the future and to identify any consequences of such violations. Reports can be made anonymously and electronically.

Each business partner is required to implement its own complaints system and to inform its employees about the reporting options.

Financing of armed groups

Our business partners are committed to preventing the direct or indirect financing of armed groups. In this context, they observe the applicable legal requirements on "conflict commodities" and comply with them accordingly.

Compliance with this Code of Conduct, controls

Our business partners are required to communicate this Code of Conduct to third parties who are used to fulfil the contractual relationship with **nitsche**. They must also take the Code of Conduct into account when selecting them and work towards compliance with it.

nitsche reserves the right to verify compliance with this Code of Conduct by our business partners in an appropriate manner. For this purpose, **nitsche** will coordinate with the business partner on the scope, time and place accordingly.

Any breach of this Code of Conduct will result in a deterioration of the business relationship between **nitsche** and the business partner. The business partner must inform **nitsche** within a reasonable period of time of the internal measures it has taken to prevent future breaches. If the business partner fails to fulfil these obligations within a reasonable period of time, fails to demonstrate an appropriate commitment to improvement within a reasonable period of time, or if the violation is so serious that **nitsche** deems it unreasonable to continue the business relationship, **nitsche** reserves the right, without prejudice to further rights, to terminate the contractual relationship in question without notice or to withdraw from the contract.

We request that all our business partners adhere to our commitment to act with integrity, fairness and independence in our day-to-day business.

Claus Nitsche & Sohn GmbH

May 2024