

Code of Conduct

Basic
Principles



Otto Krahn
Group

Foreword

Otto Krahn Group is a century-old Hanseatic company that has enjoyed success in numerous international markets.

It currently consists of five companies (ALBIS Distribution GmbH & Co. KG, MOCOM Compounds GmbH & Co. KG, KRAHN Chemie GmbH, WIPAG GmbH and KRAHN Ceramics GmbH with their respective subsidiaries) and the Otto Krahn Group GmbH as the overarching holding company.

ALBIS, a leading distributor of engineering plastics, has one of the world's most comprehensive portfolios for the plastics processing industry; it is a recognized partner to the world's leading plastics producers. MOCOM is a leading compounder and developer of engineering plastics. KRAHN Chemie is a distributor for large international chemical companies; it offers a wide range of raw chemical materials and specialty chemicals. WIPAG specializes in plastics recycling and innovative circular economy concepts. KRAHN Ceramics is an innovative project partner for processing ceramic and metal powders. As the holding company, the Otto Krahn Group defines strategic guidelines for Group companies and also acts as a professional service provider to them.

These companies are united by a sustainable long-term growth strategy that forms the basis of our business success – a strategy that Otto Krahn Group employees all over the world use in their business approach. Our employees represent our company – to customers, business partners, and the public. As such, they play an important role in shaping the reputation and success of the Otto Krahn Group.

As an international company on a growth trajectory, we comply with all laws, regulations, and similar provisions in the countries in which we operate. These include national and international regulations as well as regional and local laws. We also respect cultural traditions and customs to the extent that they comply with local laws.

This Code of Conduct describes the attributes that define us as a company and serve as our guiding principles in our working lives. They are based on the following values:



Honesty and fairness



Precision and consideration



Long-term orientation and sustainability



Openness and innovation



Entrepreneurship and initiative



Value orientation and dedication

Adherence to these guidelines is very important to our success; they are an important aspect of what defines us. As the management of the Otto Krahn Group, we will comply with these guidelines and use them as orientation for our behavior and actions. We encourage all managers and employees to read these guidelines and comport themselves accordingly in professional settings.

Our Code of Conduct consists of the above-mentioned basic principles as well as additional modules with compliance-related topics, which are explained in more detail due to their complexity. These modules are to be viewed as part of the Code of Conduct and considered in context of our basic principles, but they can also be read separately.

Modules:



Anti-corruption



Data protection



Taxes



Antitrust law



Environment



People

Let's work together to bring the Otto Krahn Group culture to life, so that we can continue successfully shaping our business activities around the world.

Hamburg, October 2023
Philip O. Krahn Dr. Jan Lösch



Our Code of Conduct summarizes what makes us a Group. These guidelines form the basis for our success and our close cooperation with our customers and partners.

Philip O. Krahn
CEO Otto Krahn Group

As a company with Hanseatic roots, the Otto Krahn Group uses the "honorable trader" as its guiding archetype. Honesty and fairness play a prominent role in our everyday work.



We act as fair competitors within an international, competition-oriented environment. We are loyal, reliable partners to our customers and suppliers. Our behavior toward external partners and market participants is always professional, transparent, respectful, and fair. We select suppliers and service providers by comparing offers based on objective criteria. We are cooperative and supportive when working with authorities, but without compromising our own rights and interests.

We reject all forms of corruption, whether they be public or private, active or passive. Our transactions are based on objective criteria such as quality and price. Accordingly, employees may not offer or grant third parties any direct or indirect monetary or other benefits in order to unfairly influence business decisions. Similarly, employees are forbidden from exploiting their positions within the company in order to demand, accept, or otherwise obtain unfair advantages for themselves or for third parties.

Gifts, favors, hospitality, and the like may only be offered or accepted to the extent permitted by law. These must not violate the corruption prevention guidelines described in the Anti-Corruption module or other internal guidelines, and they must not have any potential to damage the reputation of the Otto Krahn Group. Our corruption prevention guidelines are intended to support

employees in their daily work. Should problems arise in this area that are not covered by these guidelines, employees are obliged to clarify the matter with the competent contact persons responsible.

Honesty and fairness are important aspects of the working relationship between the Otto Krahn Group and its employees. Employees must notify their manager or the CFO of Otto Krahn Group GmbH if they become aware of possible conflicts of interest, e.g., in connection with approved secondary employment, business relationships with associated companies and persons, or stakes in other companies. Otto Krahn Group employees are obliged to disclose significant investments by themselves or their immediate family members in businesses owned by customers, competitors, or suppliers to the CFO of the Otto Krahn Group GmbH.

For more information, see the [Anti-Corruption module](#).

**Honesty and
fairness**



The motivation for our integrity must come from our inner conviction to behave as fairly and honestly as possible in every situation. The fact that we all demonstrate this every day motivates me to support this culture with my work. This includes Compliance trainings above all, but also our whistleblower system, which has been in place for many years in case our principles are violated one day.

Fabian Maerz
Head of Corporate Governance, Otto Krahn Gruppe



Entrepreneurship and personal initiative release creative and productive forces. We use these forces in conjunction with central entrepreneurial characteristics such as honesty, passion and trust to initiate and manage the continuous change necessary to succeed at all levels of the organization and achieve our common goals.

Horst Klink
ALBIS CEO

**Entrepreneurship and
initiative**

Our work is characterized by personal initiative and the will to succeed.



Our work is characterized by personal initiative and the will to succeed. The outstanding quality of our products and services is the result of successful international cooperation among a wide range of employees who deliberately make active contributions - not only within the framework of their job descriptions, but beyond them as well. In order to ensure long-term success in an environment characterized by globalization, digitization, rapid technical progress, and international competition, we must stay abreast of new developments and find solutions that meet customers' constantly evolving requirements.

This is why the Otto Krahn Group encourages and fosters entrepreneurial thinking. What does this mean? It means that we use resources efficiently, look at the big picture, contribute our own ideas, and maintain a healthy culture of learning from our mistakes.

The Otto Krahn Group follows the rules of free and fair competition. As such, we only publish complete, accurate, and truthful information about our products and services. We only obtain information about our competition from permitted sources. We strongly oppose all illegal and/or unethical business practices. In particular, we will never behave in an anti-competitive manner or support such behavior, especially with regard to anti-competitive activities.

More detailed information and example scenarios related to antitrust law and competition can be found in the Antitrust Law module.

We communicate internally and externally in an open, clear, and objective manner.



This applies to communication and conduct within the company and its employees, between superiors and employees as well as between the Otto Krahn Group and customers, business partners, or other third parties. All our reporting is clear, truthful, and timely and in compliance with all applicable legal requirements. Our financial statements contain correctly documented transactions. Official declarations to the public, the media, our investors, or other third parties are only made by persons who are authorized to do so. In principle, the Otto Krahn Group does not provide any information about matters concerning individual employees or business partners. If our expertise or that of our business partners is of a confidential nature, we will take reasonable steps to protect it.

In the competitive market environment in which we operate, we never accept the status quo – we continuously strive to develop and improve our processes, services, products, and activities. To make this happen, we are open to new methods, approaches, technologies, and market trends, which we evaluate in terms of their relevance and benefits. In a spirit of respecting others and their views, we discuss conflicts or differences of opinion in an open, factual manner and search for the most objective and appropriate solution.

The Otto Krahn Group respects the rights of employees and third parties with regard to their personal data. We always process and store this data in accordance with applicable data protection laws. All companies within the Otto Krahn Group take appropriate measures to ensure that all legal and internal data protection procedures are implemented.

You can find more information in the Data Protection module.


**Openness and
innovation**



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We should always be open – not only to new ideas, but also to setbacks and mistakes so that we can learn from them and continue to develop. Furthermore, data protection and data security are inseparable from innovation and openness. We need all these elements in equal measure to advance our organization in the long term and to develop it in a safe and secure manner.

Dirk Sadowski
CFO MOCOM



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In our industry in particular, sustainability must be one of the key aspects: Responsible and sustainable actions therefore form the core of our activities to conserve the resources of our environment, minimize CO₂ emissions, and, at the same time, operate successfully in the market.

Jens Kaatze
CEO MOCOM

**Long-term orientation
and sustainability**

The Otto Krahn Group pursues a strategy of sustainable, long-term growth.



This strategy encompasses several aspects, including commercial growth and success, sustainability, and promoting employee health and well-being in the workplace.

Sustainability is an important part of the Otto Krahn Group's corporate philosophy. We base our understanding on the UN's 17 Sustainable Development Goals. These represent the various facets of this topic: employment and economic growth, education and equality, climate and environmental protection, consumption and production. Based on these goals, we have developed guidelines for our day-to-day activities as well as specific objectives. We align our economic objectives to these guidelines as much as possible.

We consider protecting the environment for this and future generations and observing all applicable environmental protection laws and guidelines a matter of course; they are essential considerations when implementing our manufacturing processes as well as our procurement and sales activities.

This also includes using energy efficiently and optimizing resource consumption in the areas of waste, recycling and disposal. Environmental considerations are also important to us in product development, logistics and administration. Recycling technology and environmentally friendly materials are part of our business model. We participate in a variety of environmental initiatives within the chemical and plastics industry.

Employee safety and security are central concerns to the Otto Krahn Group. Consistent compliance with all applicable occupational health and safety laws is the basis for responsible cooperation. We supplement these laws with our own preventive safety measures, which are subject to continuous evaluation and improvement.

The Environment module contains more detailed information on this.

Our high standards of quality in all areas have always been, and continue to be, significant factors to the Otto Krahn Group's success.



We work with precision, we take personal responsibility, and we rethink our assessments rather than jumping to conclusions. We treat all business matters as strictly confidential, regardless of whether they concern the Otto Krahn Group or third parties. Employees are obliged to treat all business and trade secrets as confidential, even after their work for the company has ended. They must not disclose this information to unauthorized third parties, including friends or family.

Compliance with tax regulations is an essential part of our compliance rules, and the Otto Krahn Group observes all relevant tax regulations in its international activities. We only utilize tax benefits and deductions that are legally enshrined in the applicable tax regulations, and only to the extent that this is in line with our corporate strategy. The Otto Krahn Group's business activities are not defined by the exploitation of potential tax benefits. Tax consultancy firms are used to the extent permitted by law, in particular to avoid risks or double taxation.

The Otto Krahn Group does not participate in or tolerate rule violations on the part of its business partners. All employees, especially those working abroad, are expected to comply with the tax regulations applicable to them personally.

The Otto Krahn Group complies with all applicable import and export regulations, including all customs regulations. Employees are also expected to comply with all applicable internal export control regulations and guidelines. The Otto Krahn Group never imports or exports materials or products that are subject to legal inspections and require import or export permits without obtaining permission from the responsible authorities.

For more information, please refer to the Group Tax Policy in the Taxes module.


**Precision and
consideration**



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In my experience, excessive perfectionism is the death blow to success. The importance of precision and thoughtfulness, on the other hand, cannot be overstated for any company aiming for long-term success. That's why we at Otto Krahn attach great importance to these principles in all aspects of our daily work.

Dr. Jan Lösch
CFO Otto Krahn Group



Do you cling to old-fashioned ideals like value-orientation and conscientiousness? Amid the flood of information and pressure to make quick decisions in these fast-paced times, such characteristics are particularly important. And to me, they form the basis of everything I do.

Dr. Rolf Kuroпка
CEO KRAHN Chemie

**Value orientation
and dedication**

All Otto Krahn Group employees contribute to a value-oriented corporate culture characterized by open, professional and cooperative interaction.



Mutual respect, care, and fairness should be the guiding principles in all interactions between managers, employees and colleagues, regardless of hierarchy level, region or department. We respect cultural differences. Employees should contribute to a positive working environment with their conduct. Problems in the workplace should be discussed openly and those affected should seek solutions together.

It is our stated aim to not discriminate against anyone based on personal circumstances such as age, ethnicity, religion, skin color, gender, sexual orientation, disability, nationality, country of origin, or marital status. We do not tolerate discrimination, harassment or repressive behavior in the workplace. This also applies when interacting with people outside the Otto Krahn Group, such as applicants.

We trust our employees to show motivation, competence, and personal responsibility. Employee development is of particular importance to us. This includes offering employees tailored training and continuing-education opportunities and thus continuously developing their expertise. This helps us to ensure consistently high standards of quality in an ever-changing international market.

At the Otto Krahn Group, all employees work under fair and attractive working conditions. At the same time, the Otto Krahn Group expects its employees to be consistently performance-oriented, and it strives to foster personal responsibility, dedication, efficiency, and creative curiosity in each of them. Our leaders and employees are evaluated based on their individual performance and receive fair, honest feedback.

The People module describes our principles in relation to employees – they are at the heart of everything we do.

In the event of uncertainties concerning the proper response to a particular situation or possible violations of the Code of Conduct, our employees can contact their respective superiors, the management or the Tax & Legal Director of the Otto Krahn Group. Discussions will be treated confidentially to the extent permitted by law, provided that there are no material operational requirements to the contrary. You can also use our anonymous whistleblower system. You can access it from our corresponding homepage or via <https://www.bkms-system.com/ottokrahn>.

Otto Krahn Group

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