

RÖHM – DECLARATION OF HUMAN RIGHTS PRINCIPLES

Our Values

Creativity, Openness, Responsibility and Entrepreneurship (together: **CORE**) are the values that determine our actions within the Röhm Group and towards customers, suppliers, business partners and all other stakeholders.

As a globally active company, we take responsibility for the safety of our production and for the well-being of the people in our organization and our supply chain. Careful management of our natural resources, fair and supportive working conditions in a safe and healthy environment as well as good corporate governance are the cornerstones of our business activities.

We consider the protection of human rights to be a central element of our corporate governance. We base our commitment to respecting human rights on the **United Nations Universal Declaration of Human Rights** and the **ten principles of the United Nations Global Compact** as well as the **Declaration of the International Labor Organization (ILO) on Fundamental Principles and Rights at Work**. We are committed to respecting internationally recognized human rights and upholding them in our business activities and along our value chains.

In particular, this includes protection against

- child labor,
- forced labor and slavery,
- working conditions that are hazardous to safety and health,
- disregard for freedom of association,
- discrimination,
- withholding of a decent wage,
- unlawful evictions or the unlawful taking of land,
- unlawful use of private or public security forces, and
- pollution of soil, water or air, harmful noise emission or excessive water consumption that may contribute to a violation of human rights.

We are also committed to complying with the Minamata Convention (mercury), the Stockholm Convention (persistent organic pollutants) and the Basel Convention (control of transboundary movements of hazardous waste and their disposal).

This declaration highlights our commitment to respect for human rights and an intact environment. We have already set out this commitment in other company documents, e.g. our general Code of Conduct, our Supplier Code of Conduct and our ESHQE-Policy on the environment, safety, health, quality and energy efficiency.

We also pursue our values through membership and active participation in initiatives such as

- United Nations Global Compact,
- Diversity Charta e.V., and
- Responsible Care® Global Charter.

We always comply with applicable national law. In cases where international human rights are restricted by local laws, we strive to promote the principles behind the international standards without conflicting with local laws. Where local laws go beyond international standards, we will comply with them.

Our Expectations

Our values apply to all business activities and all employees of Röhm Holding GmbH and all companies worldwide over which Röhm Holding GmbH can exercise a controlling influence ("Röhm"). Within the scope of our influence, we work to ensure that the above-mentioned internationally recognized standards are complied with at all other affiliated companies.

We also expect our suppliers and other business partners to comply with the above-mentioned internationally recognized standards and to implement appropriate processes for respecting human rights and for an intact environment as a basis for our cooperation. This also includes providing us, upon request, with information on how these standards are complied with in their company and how they work towards compliance by their suppliers.

Our measures (in accordance with the Supply Chain Due Diligence Act)

Compliance with our human rights- and environmental due diligence obligations is a top priority for us as a value-oriented company. Taking human rights and environmental criteria into account when selecting suppliers is an essential part of our procurement strategy.

Risk management, preventive- and remedial measures

The analysis of compliance with due diligence obligations is carried out annually and on an ad hoc basis for our own organization and our direct suppliers on the basis of a catalogue that includes human rights and environmental risks. We weigh and prioritize the identified risks according to severity (extent, scope, irreversibility) and likelihood of occurrence. Existing preventive and remedial measures are taken into account when determining the net risks.

The topics and risks identified as priorities due to their potential severity and likelihood of occurrence are, for example, the creation and maintenance of safe and healthy working conditions and the prevention of discrimination.

We incorporate the results of our risk analyses into the relevant business processes, in particular into our supplier management system. If risks are identified, we implement appropriate preventive measures. If we determine that a violation of a human rights or environmental obligation has occurred or is imminent, we will immediately take appropriate remedial measures.

The risk analyses and measures for our own organization are carried out – and the effectiveness is monitored – by the responsible Segment Compliance Officers and Regional Compliance Officers under the guidance of the Chief Compliance Officer. The risk analyses and measures for our suppliers are carried out – and the effectiveness is monitored – by Procurement with the support of IntegrityNext under the guidance of the Chief Compliance Officer and their effectiveness is monitored.

Whistleblower system

Potential risks or violations in the areas of compliance, including human rights, and the environment can be reported by internal or external whistleblowers via the whistleblower system of Röhm.

Röhm recommends submitting reports via the online whistleblower system:

<https://roehm.integrityline.com>. Reports can be submitted 24/7 in various languages. If desired, whistleblowers can remain completely anonymous. Even if whistleblowers disclose their identity, confidentiality and the protection of personal data are safeguarded. Whistleblowers are encouraged to set up a Secure Inbox within the online whistleblower system to stay in contact with Röhm after submitting a report.

Alternatively, reports can be made directly to the compliance organization of Röhm via e-mail (compliance@roehm.com) or phone (Region Americas: +1 973 526 8758 (Regional Compliance Officer); Region Asia: +86 021 6759 1069 (Regional Compliance Officer); Region Europe and Rest of the World: +49 6151 863 7444 (Chief Compliance Officer)).

The responsibility for the whistleblower system lies primarily with the Legal and Compliance organization of Röhm.

Documentation and reports

The Chief Compliance Officer is responsible for the internal documentation of the fulfillment of due diligence obligations and regular reporting in accordance with legal requirements.

In our annual Non-Financial Declaration, we report in detail on our commitment to respect for human rights and an intact environment.

Röhm Holding GmbH



Dr. Michael Pack
CEO



Dr. Hans-Peter Hauck
COO



Martin Krämer
CFO & Labor Director