

Supplier Code of Conduct



1) Objective and Purpose

OXEA is committed to the highest standards in quality, safety, environmental and health protection, as well as ethical and lawful conduct. As our business partner, you share a significant responsibility in ensuring that our value chain complies with these requirements.

This **Supplier Code of Conduct** outlines the fundamental principles and expectations OXEA places on its contractors, suppliers, and service providers (hereinafter referred to as "Supplier" or "Business Partner"). We expect you to actively implement this Code and to communicate its contents appropriately to all relevant personnel and subcontractors assigned to perform services for OXEA. Only through close cooperation with our Suppliers can we jointly ensure sustainable, safe, and ethical business practices.

2) Compliance with Laws

OXEA expects its Business Partners to fully comply with all applicable laws, regulations, and official requirements relevant to their business operations and cooperation with OXEA. This includes, in particular, the respect for human rights, compliance with anti-corruption and competition laws, adherence to sanctions, customs and trade restrictions, health and safety standards, product safety regulations, and all other applicable legal provisions related to the products supplied to or services provided for OXEA.

3) Bribery Prevention

As a value-oriented company with integrity, we reject any form of corruption. We neither offer nor accept bribes. All Suppliers acting on our behalf or in connection with our business are prohibited from giving or offering anything of value, directly or indirectly, to any government official or entity in order to improperly obtain any business advantage or affect any government act or decision.

We recognize that every now and then small gifts are exchanged as a recognition for a good cooperation or as an appreciation of the business relationship. However, as our Supplier, we request you to not offer anything of value to our employees that could improperly influence a business decision. All employees at OXEA are required to decline or report such inappropriate gratuities.

4) Avoiding Conflicts of Interests

OXEA Suppliers are expected to avoid potential conflicts of interest in order to ensure a transparent and trustworthy collaboration. Business decisions should always be made based on objective and rational

considerations. Any personal or financial relationships that could compromise independence or impartiality must be disclosed at an early stage so that a fair and integrity-driven solution can be found together.

5) Fair Competition

OXEA is committed to fair and open competition based on the quality of our products and services. We do not engage in unfair or predatory business practices, nor do we support any activities that unlawfully restrict competition. We expect our Suppliers to fully comply with all applicable competition and antitrust laws. This includes, in particular: not entering into anti-competitive agreements with other market participants, especially with regard to prices, market sharing, production volumes, or bid rigging;

- not engaging in unlawful arrangements on purchasing or sales conditions with other suppliers or customers;
- not disclosing or exchanging confidential or competition-sensitive information about OXEA or other market participants without proper authorization;
- not engaging in unfair preferential treatment or discrimination against individual suppliers that could restrict competition;
- respecting all applicable merger control regulations and rules governing market abuse.

Any form of anti-competitive conduct can lead to serious legal consequences and may jeopardize the business relationship with OXEA. We expect our Suppliers to adhere to the principles of fair competition and to train and raise awareness among their employees accordingly.

6) Human Rights, Labor and Social Standards

OXEA is fully committed to respecting human rights without exception. We do not tolerate any form of forced or child labor, discrimination, or exploitation. Working conditions must be safe, fair, and humane, and all employees are to be treated with respect. We expect our Suppliers to comply with all applicable laws and international standards for the protection of human rights and to actively help prevent any violations. In particular:

- All work must be performed voluntarily and free from any form of forced, compulsory, or slave labor. Any direct or indirect involvement in human trafficking or exploitative labor practices is strictly prohibited;
- Workers must not be discriminated against based on ethnic or national origin, skin color, religion, gender, sexual orientation, age, physical or mental disability, or any other characteristic protected by law;
- The personal rights, individual dignity, and privacy of each employee must be respected at all times;
- Workers must be free to move at any time and must not be required or pressured to surrender or deposit identity documents, residence permits, travel documents, or any other personal original documents as a condition of employment;
- Compliance with statutory working hours, appropriate rest periods, and payment of at least the legal or industry-standard minimum wage must be ensured;
- The right of workers to freely associate, form, or join unions or other representative bodies must be respected, where permitted under applicable national law.

7) Occupational Health and Environmental Protection

As a company, we recognize our responsibility not only to ourselves but also to future generations. For this reason, protecting health and the environment is a top priority for OXEA. We therefore expect a strong commitment not only from all our employees but also from you as our Business Partner.

Protecting health includes providing a safe and health-promoting workplace for all employees – one that not only supports employee well-being but also contributes to environmental protection.

OXEA therefore expects you to ensure health and safety at the workplace by:

- strictly complying with all applicable environmental, labor, and safety regulations;
- adhering to our health and safety guidelines when performing services at our sites;
- properly maintaining and updating all licenses, permits, and registrations required for your operations;
- minimizing risks to employees and local residents and implementing appropriate preventive measures to avoid work-related accidents and health hazards that may arise from your activities.

8) Confidential Information and Business Secrets

The protection of confidential information and trade secrets is essential for a trustworthy and sustainable business relationship. OXEA expects you to handle all sensitive company information obtained during the course of the business relationship with the utmost care and to ensure appropriate protection.

You therefore commit, in particular, to:

- using trade secrets and confidential information solely for their intended purpose and not disclosing them to unauthorized third parties;
- implementing appropriate security measures to prevent unauthorized access, unlawful disclosure, or misuse of sensitive data;
- strictly adhering to confidentiality obligations, even beyond the termination of the business relationship;
- treating any received or exchanged information as confidential and sharing it only to the extent necessary.

9) Data Protection

When collecting, using, storing, or disclosing personal data of OXEA employees, customers, suppliers, or third parties, you must comply with all applicable data protection and data security laws. You are also required to take all necessary measures to protect any personal data provided in the context of your business relationship with OXEA.

10) Consequences of Non-Compliance

Compliance with this Supplier Code of Conduct is a fundamental requirement for maintaining a business relationship with OXEA. Should a Supplier violate the requirements set forth herein or fail to ensure compliance, OXEA reserves the right to take appropriate measures.

These may include, but are not limited to:

- issuing a written notice of the violation with a request for immediate corrective action;
- granting a reasonable period to remedy the violation;
- temporarily suspending the business relationship until the issue is resolved;
- in the case of serious or repeated violations—particularly where there is a lack of willingness to take corrective action – terminating the business relationship and cancelling existing contracts.

Right to Audit

OXEA also reserves the right to conduct audits or inspections to verify compliance with this Supplier Code of Conduct. A sustainable and responsible business approach is of central importance to OXEA – and we expect our Suppliers to demonstrate an equally strong commitment to these values.

11) Raising Concern

We place great importance on transparency, integrity, and compliance with legal and ethical standards. Therefore, we provide an independent whistleblower system that is available to both our business partners and our employees. This system allows individuals to confidentially and anonymously report potential violations or misconduct. It can be used to raise concerns about compliance breaches, unethical behavior, or other irregular activities. We encourage all stakeholders to use this tool responsibly to help maintain an honest and trustworthy business relationship as well as a fair working environment. All reports will be carefully reviewed and handled with the utmost confidentiality:

<https://oxea.integrityline.app/>

12) Additional Informationen and Resources

This Supplier Code of Conduct is available in additional languages online at our website:

<https://chemicals.oq.com/company/corporate-governance/code-of-conduct>

13) Acknowledgment

The Supplier confirms that it has taken note of this Supplier Code of Conduct and agrees to implement the requirements and principles set out herein in its business operations. The Supplier also undertakes to ensure that all parties involved in the provision of services (e.g., subcontractors) comply with these standards.

Name of the Company: _____

Signature: _____

Name: _____

Title: _____

Date: _____