



## Code of Conduct Polyblend GmbH



The company has been in business for over 30 years, 28 of which as a part of Polymer-Chemie. Since 1 January, 2015 as a joint venture between Total Raffinage Chimie SA, Courbevoie, France and Polymer-Chemie Holding GmbH, Bad Sobernheim, Germany.

Growth and long-term viability of the company are based on three shared values that guide all our activities:

**RESPECT, RESPONSIBILITY and EXEMPLARY CONDUCT.**



## **POLYBLEND**

The Code of Conduct describes how we put these values into practice every day. It explains our commitments and expectations towards stakeholders and provides guidance for employees and everyone who works on our behalf.

The three following priority business principles are equally critical to our success as a responsible company:

- Commitment to the highest levels of safety and security in our operations as well as protecting health and the environment.
- Compliance with the highest integrity standards, in particular by preventing corruption, fraud and anti-competitive practices.
- Compliance with internationally recognized Human Rights standards.

In every business unit, management is responsible for communicating these values and ensuring that our business principles are respected.

You can contact the Ethics Committee and the Compliance Officer on any concern related to the application of the Code of Conduct, in particular to help you make any sensitive decisions that may arise in the course of your work.

Bad Sobernheim, 3<sup>rd</sup> of May, 2018

Dr. René Herbiet  
(CEO)

Franky Smisaert  
(CEO)

Olivier Moulaert  
(CEO)



## OUR BUSINESS PRINCIPLES

We comply with all applicable national and international laws and regulations.

As a responsible industrial company, we are committed to supporting efficient and properly managed use of our energy sources and products. We take into account the needs of today's consumers and the interests of future generations. We have an active policy of environmental responsibility, which is an integral part of our sustainable development strategy.

Where there are differences between a legal provision and our Code of Conduct, we try to implement the higher standard. In matters concerning our operations we work together with authorities and non-governmental organizations and are open to concerns expressed by them.

The following business principles serve as a reference point and go hand-in-hand with our goal of achieving continued growth and benefiting shareholders, customers and employees.

### **The three key principles**

In line with applicable laws and corporate guidelines, any breach of these business principles can lead to internal and/or legal consequences!

- Polyblend seeks to ensure the highest safety, health, and environmental standards wherever we operate.
- Polyblend has introduced a strict compliance program based on a “zero tolerance” principle and is intended to prevent and detect violations of established anti-trust, anti-fraud, anti-bribery and anti-corruption laws.
- Polyblend is committed to respecting internationally recognized human rights standards within its business operations.

## OUR EMPLOYEES

We pay special attention to employees' working conditions, in particular to the respect for each individual.



We believe in loyalty, motivation, competence and sense of responsibility of our managers and employees.

We are confident that our development depends on trust and respect between the company and its employees and amongst the employees themselves.

All employees must implement our values by applying the "Polyblend Attitude": listening, mutual support, cross-functionality and determination.

Employees must ensure that they carry out their daily tasks consistent with the Code of Conduct.

- All employees undergo an annual assessment during which objectives are set, performance and compliance with the Code of Conduct are assessed and career development, facilitated by appropriate training, is discussed.
- We pay particular attention to employees' working conditions, expressly to the respect for each individual, non-discrimination, freedom of association and the right to collective bargaining, as well as the protection of health and safety. Bullying or any form of harassment is not tolerated.
- We include our employees in our development by initiating and facilitating the sharing of relevant information, by briefings and ongoing dialogue.
- We respect the privacy and especially the personal data of all employees.
- We recruit personnel solely on the basis of our requirements and the specific capabilities of each applicant.



**POLYBLEND**

- Diversity is a crucial factor for our competitive edge, attractiveness and ability to innovate and adapt. We develop our employees' professional skills and careers without any discrimination, regardless of origin, gender, age, physical disability, sexual orientation, sexual identity or affiliation with a political, religious or union organization or minority.

### **Human rights**

Alertness and personal commitment in relation to human rights in everyday life are essential.

### **Safety, health, social and environmental protection**

Employees must be aware of their personal responsibility in their daily tasks and exercise reasonable care to prevent accidents, harm to health, environmental damage and adverse impacts on the local communities. Employees are expected to understand internal standards including the impact of our activities and to continuously improve risk management.

### **Rejection of corruption, fraud and anticompetitive practices**

The company pursues a 'zero tolerance' approach on these issues and complies with the highest standards of integrity. Employees are expected to establish sound relationships with all business partners and must be able to identify and address situations that may cross the border of integrity and take appropriate action.

### **Disclosure of conflict of interests**

Employees are expected to disclose conflicts of interest. The identification and reporting of existing or potential conflicts of interest makes it possible to control risks. Employees can minimize potential conflicts of interest by:

- Avoiding any interest in the business of a competitor, supplier or customer without prior written approval from their supervisor.
- If they are employed by Polyblend on a full-time basis, not exercising any outside professional activity without first obtaining written consent from their supervisor.



### **Confidentiality and protection of intellectual and industrial property**

Employees must not disclose confidential information to third parties, whether verbally, in written or electronic form. They must also observe the rules governing intellectual and industrial property. This obligation continues to exist even after an employee leaves the company.

### **Use of IT and communication resources**

IT and communication resources are intended for professional use. Personal use within reasonable limits may be tolerated in line with applicable legislation and internal directives.

### **Involvement in political activities**

We recognize our employees' rights to individual political activities. In such a case, we expect our employees to:

- Clearly indicate that they do not represent the company Polyblend.
- Inform their supervisor if their political activities might create a conflict of interest.

## **CUSTOMERS**



Polyblend provides customers with quality products and services, and at all times strives to offer them good service at competitive prices for their individual needs.

We are open to the needs of our customers. We continuously monitor, assess and improve our products, services, technology and procedures to provide quality, safety, energy efficiency

and innovation at every stage of the development, production and distribution process.



## **Suppliers and contractors**

Polyblend's business policy regarding suppliers and contractors is to respect each party's interests with transparent and fairly negotiated contract terms. This is based on three pillars: dialogue, professionalism and fulfilment of commitments.

### **From our suppliers we expect:**

That they adhere to principles equivalent to those in our Code of Conduct and that they are willing to be audited.

That they ensure that their own suppliers and subcontractors comply with principles that are the same as ours.

That they pay particular attention to their human rights standards and guidelines, including the working conditions of their employees.

## **Business Partners**

We also apply our Code of Conduct when we manage a joint venture. In other cases, we make every effort that the partner who manages the joint venture applies principles in accordance with our Code of Conduct.

## **Shareholders**

We strive to gain the confidence of our shareholders, with the aim to provide them with a profitable and sustainable investment.

We provide accurate financial reporting on our activities.

We regularly provide full and transparent information to all shareholders. We maintain a continuous and constructive dialogue with them through diverse communication channels.

We respond to their expectations, concerns and questions on all issues.



## **The Ethics Committee**

The Polyblend Ethics Committee is responsible for the general supervision of the implementation of the Code of Conduct.

### **Composition and appointment of committee members**

The Ethics Committee is composed of representatives from the sales, purchasing and logistics departments, and are appointed by the General Management. The members are company employees who collectively have broad experience in the various business units of the company and have sufficiently demonstrated the necessary independence and freedom of judgment.

Bad Sobernheim, 3<sup>rd</sup> of May, 2018

Peter Auras, Production

Andreas Fiege, Material Management

Robert Grill, Quality

Dr. René Herbiet, CEO

Alexey Baranov, Purchasing

Udo Müller, Plant Management

Ines Vater, Shipment and Order Handling

Stefanie Weber, Sales

Ralf Wiemer, Research and Development

Arno Winter, Engineering