



Code of Conduct – Carl ROTH

Contents

05
Introduction

06-07
10 Principles

08-13
Compliance with
human rights and
labour standards

Freedom of association and assembly
Wages, benefits and education
Fundamental rights and freedoms at work
Compliance with the minimum working age
Unprejudiced and respectful treatment
Health and well-being

14-17
Environmental and
climate protection

Environmental aspects
Environmental awareness
Social commitment

18-21
Transparency
and compliance
with applicable
financial laws

Avoidance of conflicts of interest
No unfair advantage gained
Fair competition

Introduction

This Code of Conduct is part of our sustainability policy; we are committed to the 17 goals of the 2030 Agenda. The Code is based on the 10 principles of the UN Global Compact.

It serves to define a framework for action for our employees, business partners and interested parties, in which everyone can contribute to the observance, implementation and raising awareness of common corporate values. For each individual point of this Code of Conduct, measures are prepared to ensure compliance, which are monitored by our management system and evaluated by our management.

10 Principles of the UN Global Compact

01

Businesses should support and respect the protection of international human rights.

02

Businesses should ensure that they are not complicit in human rights abuse.

03

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

04

Businesses should advocate the elimination of all forms of forced labour.

05

Businesses should advocate the abolition of child labour.

06

Businesses should work to eliminate discrimination in the appointment of employees and during the term of employment.

07

Businesses should follow the precautionary principle in dealing with environmental problems.

08

Businesses should take initiatives to create a greater sense of responsibility for the environment.

09

Companies should promote the development and distribution of environmentally friendly technologies.

10

Businesses should work against all forms of corruption, including extortion and bribery.

Respect for human rights and labour standards

1 NO
POVERTY



3 GOOD HEALTH
AND WELL-BEING



4 QUALITY
EDUCATION



5 GENDER
EQUALITY



8 DECENT WORK AND
ECONOMIC GROWTH



10 REDUCED
INEQUALITIES





Freedom of assembly and association

All employees have the right to freedom of association and assembly, which must be protected and respected.



Wages, benefits and education

The benefits and remuneration, working hours and time off of all our employees comply at least with the legal regulations on minimum wage, overtime regulations, German Working Hours Act¹ and other potentially relevant guidelines (e.g. industry standards). The employees at Carl ROTH also participate in the company's profits and thus also benefit directly from the company's success.

Carl ROTH offers access to quality education as part of its extensive training programme. Trainees also have the opportunity to decide for themselves after their training whether they want to continue working for the company.

All employees have access to further training measures for their personal development and qualification.

¹ Arbeitszeitgesetz



Fundamental rights and freedoms at work

Carl ROTH is committed to upholding the following principles:

- UN Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- Conventions of the International Labour Organization (ILO)

In addition to these principles, we are committed to rejecting any form of forced labour and not to use it in any way. Furthermore, there is a strict and nonnegotiable ban on physical or psychological punishment, coercion, threats or harassment of third parties. Violations will be reported by Carl ROTH and sanctioned under personnel law.





Compliance with the minimum working age

We consistently reject any form of child labour. For this reason, we commit not only ourselves but also our suppliers to comply with both the prohibition of child labour and the permissible age restrictions on the employment of minors under applicable German law. Ensuring the safety and health of children must not be inhibited or compromised.

We also undertake to protect all young people employed by Carl ROTH in accordance with the applicable regulations of the German Youth Employment Protection Act¹.

In the event of a suspected violation of any of the above-mentioned legal rules and regulations, our employees are requested to inform their superiors immediately.

¹ Jugendarbeitsschutzgesetz

*“Only those who **value each other**
can work well together.”*



Nathalie Nyake
Dr. Volker Nagel



Unprejudiced and respectful treatment

As a company, we expect our employees to treat each other in a friendly, professional, fair and respectful manner. We see unprejudiced and inclusive cooperation as an opportunity to contribute to the entrepreneurial as well as the personal success of all. In this way, there is an opportunity to develop personal strengths and further expand areas of development. Likewise, we maintain equal opportunities for our employees and promote them on the basis of personal qualifications, skills and abilities.

The personal dignity of all employees is equally protected against direct and/or indirect discrimination on the grounds of nationality, culture, religion, age, sexual orientation, gender and gender identity, physical and/or mental limitation, ability and all other legally protected attributes.

At Carl ROTH, we also reject any kind of sexualised violence or behaviour that violates boundaries or crosses borders.

Our managers have a duty at all times to share and uphold these values in order to create a tolerant atmosphere in which all employees can interact with each other in a spirit of understanding and trust.



Health and well-being

We do our best to protect our employees from hazards in the workplace and prevent risks that could affect their integrity. Through continuous risk analysis and optimisation, we improve work processes, preventive maintenance measures and appropriate work clothing and protective equipment. To minimise health risks, we support and advocate preventive as well as healthpromoting measures in the workplace.

Carl Roth GmbH + Co. KG acts in a responsible manner and supports the Responsible Care® initiative. Within this framework and following these guidelines, we ensure that our products are produced according to recognised safety standards. Through regular training, we raise our employees' awareness of the dangers in their everyday work.

We treat the personal data of our employees as strictly confidential. Our Data Protection Officer monitors for compliance with this basic principle and must be notified immediately in cases of suspected misuse.

Environmental and climate protection





Environmental aspects

We have described our environmental aspects as part of the environmental management certification according to DIN EN ISO 14001. At regular intervals, these are reevaluated, further measures are developed and existing ones are improved.

The An der Mole company site is classified as an establishment covered by the German

Ordinance on Hazardous Incidents¹. A concept for the prevention of hazardous incidents in accordance with Article 8 of the Hazardous Incident Ordinance² was developed and implemented. This site has another special feature, as it borders directly on a nature reserve. Many preventive measures have therefore been taken here to ensure the integrity of nature.



Environmental awareness

It has always been a concern of the shareholders to raise awareness for a sustainable approach to nature. As early as the 1980s, Carl ROTH received several awards from the Chamber of Industry and Commerce as an environmentally conscious company. This awareness is reflected in many investment and support measures. For example, our automatic small parts warehouses are cooled in summer and heated in winter by means of highly energyefficient geothermal pipes.

This required large investments that will only pay off in 50 years' time – one of many examples that show how much we care about environmental protection.

Carl ROTH's specialist group for the environment is concerned with the continuous improvement of our environmental and sustainability measures and promotes awareness among our employees by providing targeted information on environmental and sustainability issues.

¹ Störfallbetrieb ² Störfallverordnung



Social commitment

As a traditional Karlsruhe company, we are closely connected to the region and are involved in local projects.

The Carl ROTH Development Award is given annually at national level. The award is aimed at young chemical scientists. It is given in recognition of resource-conserving synthetic routes or innovative uses of chemicals.

We support the research projects of Wasser 3.0 gemeinnützige GmbH, which campaigns for water free of microplastics and micropollutants, and thus contribute to the removal of these pollutants from our waters.

In the course of our Christmas fundraising campaign, we have so far supported various environmental projects, such as the cleaning of beaches from plastic by NaBu.

+++

*“It is important to
me to assume
responsibility –
for **myself, my
work and the
environment.**”*

+++

Dr. Christina Belenki



Transparency and compliance with applicable financial laws

12 RESPONSIBLE
CONSUMPTION
AND PRODUCTION



9 INDUSTRY, INNOVATION
AND INFRASTRUCTURE



16 PEACE, JUSTICE
AND STRONG
INSTITUTIONS



17 PARTNERSHIPS
FOR THE GOALS





No unfair advantage gained

Carl ROTH will not, now or in the future, enrich, participate in or otherwise support any form of corruption, bribery or other forms of taking unfair advantage or money laundering.



Avoidance of conflicts of interest

We attach great importance to ensuring that our employees do not have conflicts of interest or loyalty. For this reason, there are regulations that ensure that our employees are not influenced by bribery or other forms of corruption in the course of their everyday work. Gratuities such as payments, favours or gifts from third parties may only be accepted where consistent with

customary business practices. These gratuities may not be kept personally, but must be forwarded immediately to the Human Resources Department. If an employee is in doubt as to whether a gratuity is consistent with customary business practices, he or she must consult a superior before accepting.



*“Legislation,
regulations and
standards are
the basis for
**long-term
business
success.**”*



André Houdelet
Managing Director





Fair competition

We are firmly committed to free and fair competition and to abiding by the applicable statutory provisions. We do not participate in price fixing or price dumping, and we do not disseminate false information about our competitors or their products.

We disassociate ourselves from any type of industrial espionage and do not otherwise attempt to gain a competitive edge by fraudulent means.

We attach great importance to long-term and trust-based business relations with our suppliers. At the same time, we make sure that they comply with high social and labour standards just as we do.

To ensure adherence to this principle, our suppliers are required to observe our "Code of Conduct for Suppliers".

Employees must always maintain a professional and respectful manner when

dealing with our customers. They have an obligation to promote the best interests of our company at all times. All employees represent Carl ROTH in their function, therefore we oblige all employees to communicate in an appropriately respectful manner at all times. This applies to all lines of communication, particularly via e-mail.

During our daily work, our employees often receive confidential and proprietary information from customers and suppliers. For this reason, a declaration of secrecy should be signed mutually for the exchange of such classified data.

All kinds of corporate record must be archived carefully and must be protected against unauthorised access. All employees must observe company guidelines with regard to the processing of company details using data processing devices.

Carl Roth GmbH + Co. KG
Postfach 10 01 21, 76231 Karlsruhe
Schoemperlenstr. 3–5
76185 Karlsruhe
Telefon: +49 721 5606-0
Telefax: +49 721 5606-149
www.carlroth.com