



Code of Conduct **ALCOCHEM**



Versie 20240403

Message from the General manager:

We value a clear and transparent, open and honest cooperation with our employees and with our stakeholders. In our work we respect each other and our environment. In our choices we take sustainability in all its facets, the environment and the footprint we leave behind on the earth into account.

With the vision to not only do business, but also contribute to the future of our world, we support various charities and develop similar projects in the areas where we work or operate.

It is important that we enjoy our work and that the conditions for our employees are optimal. We invest a lot of time, money and energy to achieve this.

In a constantly changing world, we adapt and are open to new opportunities, cultures and developments with sustainability as pillar in all our decisions.

General manager,
Raymond Bos



Introduction

The Code of Conduct and Ethics is the standards for the way we work at Alcochem.

The Code is intended to help with certain decisions in your day-to-day work, whatever you do and wherever you do it. The Code is supported by a number of more detailed policies that are part of the conduct and ethics policy of Alcochem. These are listed in this document.

Alcochem takes the Code, and all underlying policies, very seriously. As a member of the Alcochem team, you are obliged to live by the principles and spirit of the Code and the Policy Framework.

Who does the Code apply to?

This Code applies to anyone who is employed by Alcochem including contractors and consultants.

Alcochem encourages our stakeholders to adopt and maintain similar conduct and ethics principles to those outlined in the Code.

When does the Code apply?

The Code applies to you whenever you are identified as a representative of Alcochem. In some circumstances, this will include times when you are outside your immediate workplace or working hours but in the community on behalf of Alcochem.

What will happen if I breach the Code?

Failure to comply with the principles or the spirit of the Code or the Policy Framework will be considered a serious breach of the policy of Alcochem and will be investigated. Breaches of the Code or the Policy framework could result in disciplinary action, ranging from a verbal warning through to the termination of your employment for serious breaches.

How can I be sure my conduct complies with the Code and Policy Framework?

While the Code provides general guidance and minimum expectations regarding your conduct, no code or policy can ever cover every conceivable circumstance you may face. In everything you do, you are expected to listen to and act upon your conscience to help build and maintain the reputation of Alcochem and your own.

If you are in doubt about whether your conduct is consistent with this Code, it may help you to ask yourself the following questions:

- Does it feel like the right thing to do?
- What would an Alcochem customer expect or want me to do in this situation?
- What would the reaction be if this was reported in the newspapers?
- Would my colleagues or manager consider my behaviour appropriate?
- What impact might this have on Alcochem and its commitment to customer value?

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1. Alcochem company

Corporate Identity

Alcochem BV is a group of companies playing a global role on several markets.



Alcochem Minerals BV

is a distributor and logistic service provider covering the complete supply chain and with that serves both producers and end-users of (mineral) raw materials for the detergent, glass, FEED, and other industries.



Alcochem Hygiene BV

is providing non-chemical pest control products, strongly driven by innovation. The clear focus is to provide trendsetting solutions for the future.



Alcochem Steel BV

is a specialist in tailor made steel products and aluminium injection molded products, including a part of complete assemblies. With an own office and strategic connections with production facilities in China and Vietnam, a competitive price and excellent quality control is guaranteed over the total supply chain.



Alcochem Packaging BV

Is a specialist in integrated chain management and facilitates cooperation between suppliers and customers in commercial cleaning, sanitary and hygiene products.

Creating cross connections over the above-mentioned business fields, our added value is to build bridges between manufacturers, developers, logistical partners and customers. Core values in this respect are reliability of deliveries, speed, flexibility and accurate communication throughout the complete process and supply chain.

Alcochem wants to act as an organization that strives at all times for quality, continuity and satisfying our partners in business, complying to applicable legislation.

Alcochem is ISO9001 and ISO14001 certified.

History of Alcochem

Alcochem B.V. was founded in 1974, setting up cross-trade activities initially between Russia and China for industrial **Alcohol** and **Chemical** products.

Having offices in and knowledge of the Polish market, several requests came in to look for production facilities that could compete with the relatively expensive labor in Western Europe. As a result Alcochem Steel and Alcochem Hygiene were added to the business activities of the Alcochem group.

In the 80-ties, market demand steered Alcochem to Central Eastern European countries and create a solid presence of material for the detergent industry, where soon Poland became the main market.

Due to economic developments, Alcochem transferred the main production capacity for Steel and Hygiene's products from Poland to Asia in the beginning of the century.

The history of Alcochem B.V. is based on personal contacts and network creation and with that open and honest relationship with all our partners involved. The current set up of the Alcochem group is having 3 divisions, represented by offices in the Netherlands, China, Hong Kong, Russia and Spain.

2. Alcochem mission and vision

Since the world is changing constantly we believe that we need to adjust to these changes and have an open mind towards new opportunities, cultures and developments. We highly value the fact that we want to have pleasure in our work; it implicates however that we need to make choices. These choices are based on creating a promising and healthy group of companies and with that a stable base for the future of our activities.

F – Financial healthy

U – Unity

N – Ability to say NO

Financially healthy

Alcochem is aiming to give as much added value to our partners in business. A reasonable, competitive but healthy margin is the base for a stable and sustainable high service level in the complete chain.

Unity

Throughout the complete Alcochem group, we strive to work according strict rules and norms, protection in uniformity in our actions and motivation, both internal as well as external. We therefore are proud to be ISO 9001 (2015) and ISO 14001 (2015) certified, FSA insured and rated with a bronze medal by EcoVadis.

No

Alcochem chooses to limit their activities to long term business perspective and to find a healthy synergy within the group. By doing that, Alcochem stays away from short term deals and from markets in which its expertise cannot be executed. We strongly believe that we create strength in limiting our choices.

3. Company culture

We believe in an organization with a strong 'family-vibe' without strict hierarchy. We believe in self-supporting teams taking initiative and working closely together.

Entrepreneurship and the ability to work independently will go hand in hand. In order to achieve this, we use our own knowledge, organize internal training sessions and we stimulate personal growth. Growth of the organization is not a goal in itself but a result of delivering an excellent service.

4. Working conditions

Alcochem has terms and conditions of employment for its employees.

Contract

Alcochem strives for long-term cooperation with the employees therefore Alcochem offers mostly contracts for an indefinite period.

Health

Alcochem has a high standard safety level for the health of the employee. The employment conditions include a sports allowance, a company bicycle and a contribution for computer glasses. In addition, preventive measures are actively taken by Alcochem against RSI and possible other physical complaints.

Safety

Alcochem offers its employees a safe environment by meeting all legal and non-statutory inspection requirements for material and other company assets. A safety policy is drawn of. In addition, a protocol against sexual intimidation, aggression and violence and/or discrimination has been drawn up for ethical issues and has been added to the employment conditions. For internal problems, Alcochem has an external confidential advisor that all employees can rely on.

Balance private live and work

Alcochem attaches great importance to a good balance between private life and work. Alcochem offers flexible working hours and overtime is not encouraged or in exceptional cases compensated in time. Working from home is integrated in our personnel policy.

Assessments and courses

Assessment interviews are held annually to improve the performance, increase the motivation of the employee and make optimal use of the capabilities of the employee. In addition, Alcochem invests in courses and education. To enhance current and future-proof skills and provide potential growth opportunities. Through courses and education Alcochem experiences employees have more appreciation for and bond with the workplace, they are more motivated and they remain more loyal to the organization.



Alcochem Safety Policy

1. Introduction

Alcochem is committed to maintaining a safe and healthy work environment for all its employees, stakeholders, and visitors. The company is dedicated to preventing accidents and injuries in both the office and warehouse settings by promoting a strong safety culture.

2. General Safety Philosophy

Our goal is to create an accident-free workplace. Alcochem strives to protect its staff, property, and the public through proactive safety measures, continuous training, and adherence to safety standards. This policy serves as a guideline to achieve these goals, and the active participation of everyone – from management to employees – is essential for success.

3. Responsibilities

- **Management:** Management is fully committed to the safety program and provides the necessary resources, equipment, training, and guidance to support the safety efforts of all employees. It is our duty to ensure safe working conditions and to promote safety and continuous improvement.
- **Employees:** Every employee, regardless of their position, is responsible for adhering to safety protocols and working in a safe manner. Employees are expected to report hazards, follow safety procedures, and contribute to identifying and implementing improvements in safety measures.
- **Safety Participation:** The involvement of all employees, from management to operational staff, is necessary to achieve a safe work environment. This means active participation in safety meetings, safety training, the annual evacuation drill, hazard identification, and adherence to safe work practices.

4. Safety Procedures and Equipment

Alcochem will provide all employees with the appropriate safety equipment and the necessary training to use it effectively. There will always be at least 2 trained first aid responders (BHVer's), fire extinguishers, alarms, tools, machines, boilers, air conditioning units, and roller doors that are inspected annually. Alcochem is certified for Scope 10 and Scope 12. Employees must properly use personal protective equipment (PPE) and follow the safety procedures specific to their tasks. Procedures must always be followed to prevent accidents and injuries.

5. Continuous Improvement

The company will continuously evaluate its safety program to identify areas for improvement. The annual Risk Inventory & Evaluation (RI&E) and feedback from employees will form the basis for updates to safety procedures and protocols. Our commitment to continuous improvement is key to achieving an accident-free workplace.

6. Accident and Injury Prevention

Alcochem is determined to create an accident-free workplace. This involves adopting a proactive approach to safety by identifying potential risks, minimizing hazards, and providing training that enhances employees' safety awareness. Every employee is responsible for their own safety and that of their colleagues. When unsafe situations or practices are identified, corrective measures will be immediately implemented.

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**7. Compliance with Legislation**

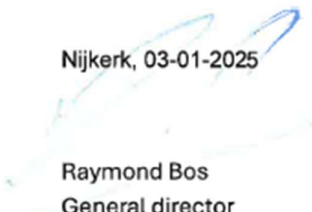
This safety policy is in line with the Occupational Health and Safety Act (Arbowet) and all applicable regulations. Alcochem complies with the specific guidelines for safety procedures within our workplace and work environment, as set out by the Arbowet and/or other relevant legal standards. All employees will be informed about the Arbowet to ensure that their actions are in accordance with its provisions.

8. Reporting and Investigation of Incidents

Accidents, injuries, or unsafe situations must be immediately reported to a supervisor or the safety officer. All incidents will be thoroughly investigated to determine their causes, and corrective actions will be taken to prevent recurrence.

9. Conclusion

At Alcochem, safety is a core value, and we believe that all incidents can be prevented. Every employee has a role in maintaining a safe workplace, and we rely on active participation, communication, and commitment to ensure the safety of everyone within our company. Through our collective efforts, we will achieve our goal of an accident-free work environment.



Nijkerk, 03-01-2025

Raymond Bos
General director

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5. Ethical principles

We act in the best interests and value the reputation of Alcochem

The reputation of Alcochem as a trusted and respected organization is one of our greatest assets. Each of us has the ability to build and maintain the reputation or to harm that reputation and undermine the performance of Alcochem.

The stakeholders expect Alcochem and everyone who works at Alcochem to act professionally and ethically. We must do what we can to meet these expectations and support others to do the same. In everything you do, you should consider how your or someone else's actions could impact on Alcochem performance, reputation or other assets and take action to prevent or remedy anything that could adversely impact Alcochem.

We act with honesty and integrity

Honesty and integrity are essential to everything we do at Alcochem.

Our success depends on the trust of our customers, which is earned by acting with honesty and integrity.

We treat others with respect, value difference and maintain a safe working environment

Alcochem values difference and is committed to achieving a truly diverse workforce that respects the differences of each other. We are all expected to treat the people we deal with through our work at Alcochem with dignity and respect, whether they are colleagues, customers, suppliers or other third parties. Unlawful initiation, harassment of any kind, bullying or victimization or other unacceptable or offensive conduct will not be tolerated. Alcochem respects the right of all individuals to work in a safe working environment that promotes well-being.

We identify conflicts of interest and manage them responsibly

Acting honestly and with integrity also means managing conflicts of interest and never putting yourself in a situation that puts your own personal interests before those of Alcochem or our customers. The perception of a conflict of interest can do as much damage to the reputation of Alcochem as an actual conflict of interest.

We respect and maintain privacy and confidentiality

In your work at Alcochem, you may come across private and confidential information relating to Alcochem, colleagues, customers, suppliers or other third parties. When people provide us with this type of information, they are trusting Alcochem. Misuse of confidential and private information can have severe commercial and reputational consequences for Alcochem and can also greatly affect those whose information is misused.

Alcochem is committed to maintain the confidentiality and security of this information and you are expected to help honor this commitment.

We do not make or receive improper payments, benefits or gains

Integrity and trust are inconsistent with improper payments, benefits or gains of any kind.

There are certain situations that have a higher risk of an improper payment, benefit or gain being made or received. These include rewards from current or potential customers or suppliers that are out of the ordinary, such as cash, cheques, gifts, gift certificates or travel of a high value.

Where rewards from a current or potential customer or supplier create any obligation or expectation that you will give preferential treatment to the person or company offering the reward, the reward is improper and must be refused.

We comply with this Code, the standards and values and Alcochem policies and procedure

As a global organization, we are subject to the standards and values in all locations where we do business. You must act according to the standards and values at the locations where you work. A violation can have serious consequences, both for Alcochem and for you as an individual.

Alcochem is committed to helping you by designing systems and processes that conform to the standards and values of the locations, and by providing relevant policies and training.

We immediately report any breaches of the Code, the law or Alcochem policies and procedures

You are required to comply with this Code and report any conduct that may be in breach of the law, this Code, the underlying Policy Framework or any other Alcochem policies or procedures as soon as you can.

Any reports of a breach of the Code will be taken seriously and investigated appropriately by Alcochem. It is important that all reports are based on truth and fact. If you make a report in good faith, you will not be disadvantaged personally or in your employment, even if the conduct that is reported is later found not to be in breach of the Code. At the same time, if you make an intentionally false or malicious report, you may find yourself in breach of the Code, and dealing with the consequences that follow.

There are many different ways for reporting a breach - who you should raise the matter with will depend on the particular circumstances.

In most cases, you should raise breaches of the Code, the law or policies and procedures with your manager or your supervisor. Everyone has also the right to file complaints to report to the confidential counsellor.

6. Alcochem Responsibility Program

Since 2007 Alcochem has made Financial commitments to projects which are connected to the areas or markets in which Alcochem is active.

Alcochem has set up a few basic rules in which these commitments find their practical execution;

- Projects are set up in co-operation with the partners in the subjected area, where a common contribution should secure the involvement and dedication from both sides.

- Projects are linked to People (labour conditions) and Planet (environmental conditions)

- A protocol with all our production parties is signed in which no child labour is accepted in any way. This protocol will be controlled and monitored by our own local staff.

- Apart from the nature of the projects mentioned above we dedicate a part of our budget to support programs that are connected to the well-being of children (our future generations).



7. Quality management

The management of Alcochem B.V. values the quality management system as an important tool for the efficient management of business activities. It is also seen that the means of understanding of those processes will contribute to the wishes and needs of our partners in business.

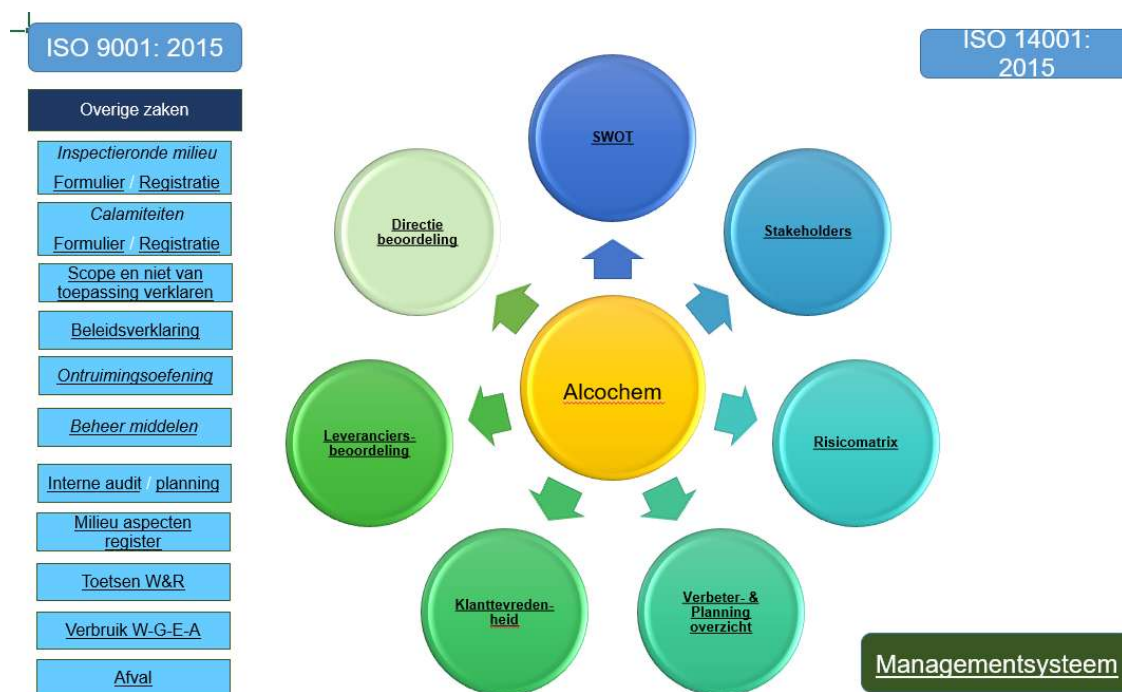
Alcochem has been audited for the following certifications;

- ISO 9001
- ISO 14001
- FSA insured

The pillars of the quality management system are the business processes, focussing on continuous risk assessment and improving the quality management system as a whole.

The quality management system of Alcochem B.V. is in accordance with the ISO 9001 standard and has been fully incorporated into the quality manual.

All employees assist in working in accordance with agreed and/or established procedures so that within Alcochem B.V. necessary quality assurance will take place.



8. Sustainability

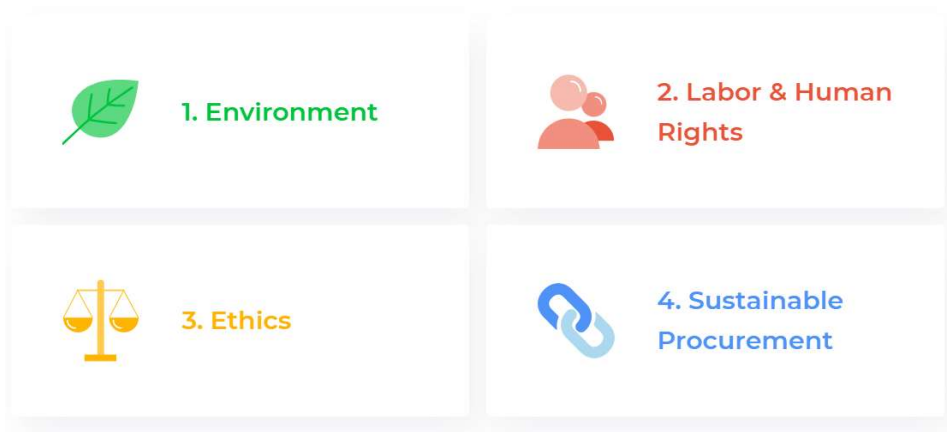
Environmental, social, and ethical performance – or Sustainability – is an essential factor for smart business today. More and more companies, including our trading partners, are under immense pressure to improve their transparency and sustainability practices, and this includes the sustainability of their trading partners (Alcochem).

The management of Alcochem endorses the mission and vision of EcoVadis.

EcoVadis is the first and largest collaborative platform in the world for trading partners to share sustainability performance information. EcoVadis is a global provider of sustainability ratings based on reliable assessments. The EcoVadis sustainability assessment methodology is central to our Ratings and Scorecards and is an evaluation of how well a company has integrated the principles of sustainability/CSR into its business and management system.

Alcochem will perform an annual assessment by EcoVadis to reduce risks, improve performances and improve environmental and social results.

A better planet on which we all depend.



9. Assessment new supplier

Alcochem assesses new suppliers on whether they meet the quality and sustainability standards of Alcochem BV. The sustainability requirements are requested and personally audited by Alcochem on location.

Topics such as general company information, company structure, financial information, quality and environment policy and worldwide requirements are included in the assessment.

With this assessment, Alcochem wants to prevent misconduct and encourage the following issues:

- * Relationships with ethical suppliers who source raw materials from conflict-free producers
- * Production methods that align with environmental, social and humanitarian goals
- * Compliance with Government Laws, Standards, Regulations
- * Transparent and responsible dealing with potential suppliers

10. Internal procedure Sanction countries

Alcochem will do all to prevent any delivery to a sanction country or person and set up a system to recognize/eliminate this danger. Within this guideline we have set the steps that sales and operations must make before release of a new account.

We recognize three steps in this proceeding:

- * Country
- * Product
- * Customer

Country:

When we receive an enquiry/order we check if the destination country is listed in EU/UN or US listing of sanction countries. If so we stop all actions and inform the management of Alcochem, if not we proceed with execution of order quotation.

Product:

We check if the product is listed as dual Use, check with EU taric database. If so we stop all actions and inform the management of Alcochem, if not we proceed with execution of order of quotation.

Customers:

If the customer is in a sanction country and we want to proceed with delivery, we need to know who is the owner and is he on the EU/UN or US listing of sanction. If so we stop all actions and inform the management of Alcochem, if not we proceed to next step.

Last and final check: If the customer is a trader. We want to know his customers.

Only with positive result of the assessment we will proceed deliveries.