



# Siebert – Code of Conduct

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## Preface

As a privately run, medium-sized family business, Siebert believes in working with its employees, customers, partners and suppliers in a spirit of partnership and trust. The company is committed to upholding responsible corporate practices – for modern health and safety, for the selection and use of innovative and sustainable raw materials,

for social engagement and personal responsibility, and for modern infrastructure and digital technology. These principles form part of the Code of Conduct and actively drive the actions of Siebert.

## The Siebert Code of Conduct

Siebert supports the goal of creating a more inclusive and sustainable economy and, as a signatory to the UN Global Compact, is committed to the ten principles set out in this international initiative. The company respects the principles of the Universal Declaration of Human Rights, as well as adhering to the International Labour

Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. As a long-standing partner of the United Nations, Siebert also supports the UN's Sustainable Development Goals.

## Nature of collaboration

Human rights are universal and fundamental rights and freedoms to which all humans are entitled. They are set out in the declarations and treaties of the United Nations and are non-negotiable. Siebert is mindful of and supports the observance of these rights, which include not only freedom of expression but also the right to privacy, the protection of life and health, the

right to education, fair working conditions and a dignified standard of living. The company also supports the principle of freedom of association, the right to collective bargaining, the elimination of forced labour, the abolition of child labour, and the prohibition of discrimination in respect of employment and occupation as enshrined in the Fundamental Principles of the ILO.

## Diversity of staff

For Siebert, the variety and diversity of our employees is a particular strength, bringing together different perspectives, paving the way for open discussions, strengthening cooperation, and helping to overcome prejudices. Accordingly, Siebert considers these aspects when evaluating new vacancies and takes a clear stand against all forms of discriminatory behaviour. Siebert expressly rejects discrimination based on gender

identity, origin, skin colour, religious beliefs, age, disability, sexual orientation and other legally protected characteristics.

## **Sustainable Development Goals: The 17 SDGs**

Siebert is guided by the 17 Sustainable Development Goals (SDGs) developed by the United Nations:

- 1.** End poverty
- 2.** Achieve food security – end hunger
- 3.** Healthy lives for all
- 4.** Education for all
- 5.** Gender equality
- 6.** Water and sanitation for all
- 7.** Sustainable and modern energy for all
- 8.** Sustainable economic growth and decent work
- 9.** Resilient infrastructure and sustainable industrialisation
- 10.** Reduce inequality
- 11.** Sustainable cities and settlements
- 12.** Sustainable consumption and production patterns
- 13.** Take urgent action to combat climate change and its impacts
- 14.** Conservation and sustainable use of the oceans, seas and marine resources
- 15.** Protect terrestrial ecosystems
- 16.** Peace, justice and strong institutions
- 17.** Strengthen the means of implementation and the global partnership



# Occupational safety, health and environmental protection

## Responsibility for humans and the environment

The values of sustainability and responsibility for humans and the environment are firmly established at Siebert. They are reflected not only in production but also in the way that the company works with its employees, customers and partners. In order to ensure sustainable production, Siebert places particular value on the sparing use of resources and is committed to maintaining an unspoiled environment. The same applies to the health of its employees. Accordingly, health and safety are also important goals that shape the actions of Siebert – and certifications according to ISO 14001, ISO 45001 and DIN EN ISO 21469 serve to document the company's deep commitment to environmental protection and health and safety.

Siebert is also taking numerous steps to reduce its corporate carbon footprint (CCF) and has been geared towards climate neutrality since the start of 2022. The portion of emissions that still cannot be avoided is compensated for by means of corresponding carbon offset projects.

Siebert is also part of the Europe-wide Sustainability Initiative of the Lubricant Industry (NaSch). Launched by the Association of the German Lubricant Industry (VSI), this initiative identifies standards for calculating the carbon footprint that will ensure comparability in the future.

## Workforce involvement

For Siebert, the motivation and esteem of all employees are key factors in company success. This is reflected in how we communicate and in our sense of collaboration and mutual support. By creating an atmosphere based on respectful treatment and fairness, Siebert lays the foundation for an active and constructive communication culture in which employees are able to contribute and drive the company forwards in the long term.

Likewise, security and participation ensure that staff have a strong sense of attachment to the company. The employees have the right to unionise.

They also collaborate actively with the works council with a view to achieving a synthesis of the interests of employers and workers.

At the same time, a majority of employees at Siebert benefit from a binding collective bargaining agreement that goes well beyond minimum wage, as well as from the collective agreements that apply within the chemical industry.

# Collaboration with business partners

## Prohibition of corruption and bribery

Corrupt conduct and bribery make it impossible to engage in collaboration based on trust and the principle of equality. Siebert therefore expressly distances itself from corruption and bribery and is staunchly committed to free and fair competition. This is underpinned by the company's active membership of the UN's Global Compact initiative.

In addition to equal treatment of its partners, Siebert is committed to a high level of transparency. Employees should avoid conflicts of interest wherever possible and transparently

disclose conflicts of interest where they are unavoidable. They must not accept any gratuities that could influence business relationships or decision-making. Moreover, no advantages may be conferred based on family relationships or friendships.

## Gifts, invitations and other gratuities

In order to maintain independence, the business interests of Siebert serve as a basis for decision-making. This centres around customer benefit and must not be influenced by personal interests. Employees are therefore forbidden from accepting gratuities, gifts and privileges that jeopardise fair and objective decision-making. The acceptance of promotional gifts and invitations is only permissible if they are in accordance with company policy and do not violate applicable legislation. If

employees of Siebert are influenced with undue advantages by suppliers, this will lead to the termination of the supplier relationship following an investigation of the individual circumstances.



## Requirements for suppliers

Siebert is committed to the ten principles of the UN's Global Compact initiative. These principles are based on a catalogue of basic values from the areas of human rights, environmental protection, workers' rights and the fight against corruption and are guided by the overall concept of sustainable development. In accordance with our

Conditions of Purchase, we expect our suppliers to adhere to the ten principles of the Global Compact.

## Customs, export control, sanctions, money laundering, counter-terrorism laws

When it comes to its business activities, Siebert expects all participants to act responsibly. Applicable legal requirements and laws must always be complied with. This particularly applies

to all applicable provisions relating to customs matters, exports, money laundering, counter-terrorism laws and sanctions.

## **Reporting/ financial integrity**

Siebert maintains regular, proactive and transparent reporting to its lenders.

We record all business transactions, assets and liabilities in accordance with the applicable statutory and internal regulations on financial reporting. We ensure proper bookkeeping as well as the retention of business records in accordance with the respective statutory retention periods.

Through suitable technical and/or organisational measures, the departments responsible ensure that, as part of the reporting processes, all necessary information is complete and factually correct and is provided at the required time.

## **Finances**

Siebert is responsible in its handling of the funds provided by lenders.

The departments responsible ensure, as part of their business activities, that exceptional financial risks are avoided or are minimised by way of

appropriate hedging measures. Existing internal guidelines on the minimising of financial risks are adhered to.

## Data protection

Confidentiality and due diligence are important factors for Siebert. Priority is therefore given to protecting the sensitive data of employees, customers, suppliers and other partners.

With this in mind, the company takes account of all currently applicable legislation for the protection of personal data.



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