

Ethics policy

Objectives of the Code of Ethics

For TRIGON Chemie as a responsible company, it is essential that all business activities are conducted on the basis of legal requirements and in an ethical manner. The principles defined in this Ethics policy support our sustainable development and define the framework to which we at TRIGON Chemie adhere. Our aim with this policy is to promote a strong ethical culture, establish trust within and outside the organisation and ensure the integrity of the company.

Values and principles

As a global supplier of speciality chemicals, our activities are subject to a large number of laws. Compliance is therefore a basic requirement for all our business activities and is non-negotiable. Beyond that, ethical principles characterise our daily actions. We are guided by the recognised values of honesty, fairness, integrity and mutual respect.

At TRIGON Chemie, we cultivate an open, friendly and supportive corporate culture. Our loyalty and our mutual respect are essential fundamental elements that enable us to create an atmosphere of trust and co-operation.

Scope of application

This ethics policy covers all our business activities and all activities of TRIGON Chemie and applies to all TRIGON Chemie employees (employees, trainees, interns and agents) regardless of their position in the company. We also expect our business partners to behave in accordance with this policy, in compliance with the law and with integrity, including within their value chain.

Laws and other regulations

Compliance with applicable laws and internal and external guidelines is the basis of all our business activities and decisions. As a globally active company, we are subject to export controls as part of our worldwide activities and comply with applicable foreign trade law and sanctions in relation to individuals, companies and organisations.

In particular, TRIGON Chemie complies with the provisions of the Dual-Use Regulation and the Chemical Weapons Convention.

Bribery, corruption and anti-trust law

For us at TRIGON Chemie, our reputation as a reliable company is of crucial importance. With our business activities, we encourage free and fair competition and comply with the relevant national and international standards.

Our focus in competition is always on the quality of our products and services. Transparent, fair and professional behaviour on the market ensures our long-term interests and helps TRIGON Chemie to remain competitive in the future.

We therefore strictly reject any form of corruption. We comply with antitrust law and do not enter into any price fixing or market sharing agreements. We have a zero-tolerance strategy here.

Money-laundering

Money laundering refers to the smuggling of money from criminal activities into the regular economy to make it appear that this money has been legitimately earned. We take appropriate precautions to ensure that our company is not misused for money laundering - because unintentional complicity in money laundering and terrorist financing is also considered a criminal act. This requires a high level of alertness in our interactions. In practice, we must therefore constantly ensure that our company is effectively protected from criminals who want to launder their illegally generated funds and assets. We only conduct business activities with reputable partners who comply with applicable law and obtain their resources from legitimate sources. We carefully verify the identity of potential customers, business partners and other third parties.

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Conflicts of interest and gifts

We only make gifts out of courtesy or in recognition of local custom and in accordance with applicable laws and exercise caution and common sense to avoid misunderstandings about our motives and to prevent reputational damage. The acceptance of cash or expensive gifts in excess of the specified threshold is prohibited.

Our personal relationships and interests must also not interfere with or influence our business activities and decisions. We therefore take care to avoid situations in which private and professional interests could collide or even give the impression that this is the case. A conflict of interest is not misconduct per se - but how we deal with this situation can be. Transparency is crucial here.

Confidential information and data protection

A large part of TRIGON Chemie's business information is confidential and in some cases legally protected by non-disclosure agreements. In order to protect this confidential information, we secure this data technically, organisationally or through contractual agreements. All personal information about employees, customers, business partners and suppliers as well as other third parties is used carefully and treated confidentially at TRIGON Chemie. The protection of this information must be fulfilled with the highest care. Special caution is required when exchanging information.

Whistleblower system / complaints procedure

TRIGON Chemie has established a whistleblower system to identify possible violations of laws or guidelines. All employees, business partners, customers or other third parties are requested to report serious violations of laws, internal rules or the Code of Conduct to the generally accessible contact point (compliance@trigon-chemie.com). All reports will be treated in strict confidence while maintaining anonymity.

Taking measures & checking their effectiveness

Wherever we identify potential or actual legal and ethical violations in the course of our activities or business relationships, we will take appropriate action. If we do not recognise any improvements, we reserve the right to terminate the business relationship as a last resort.

TRIGON Chemie commits itself and its employees to comply with this Ethics policy at all times, to actively pursue all aspects mentioned, to promote progress and to communicate this transparently.

A handwritten signature in blue ink that reads "P. Reinisch".

Dr. Paul Reinisch, Managing director

Schlüchtern, 21.06.2024