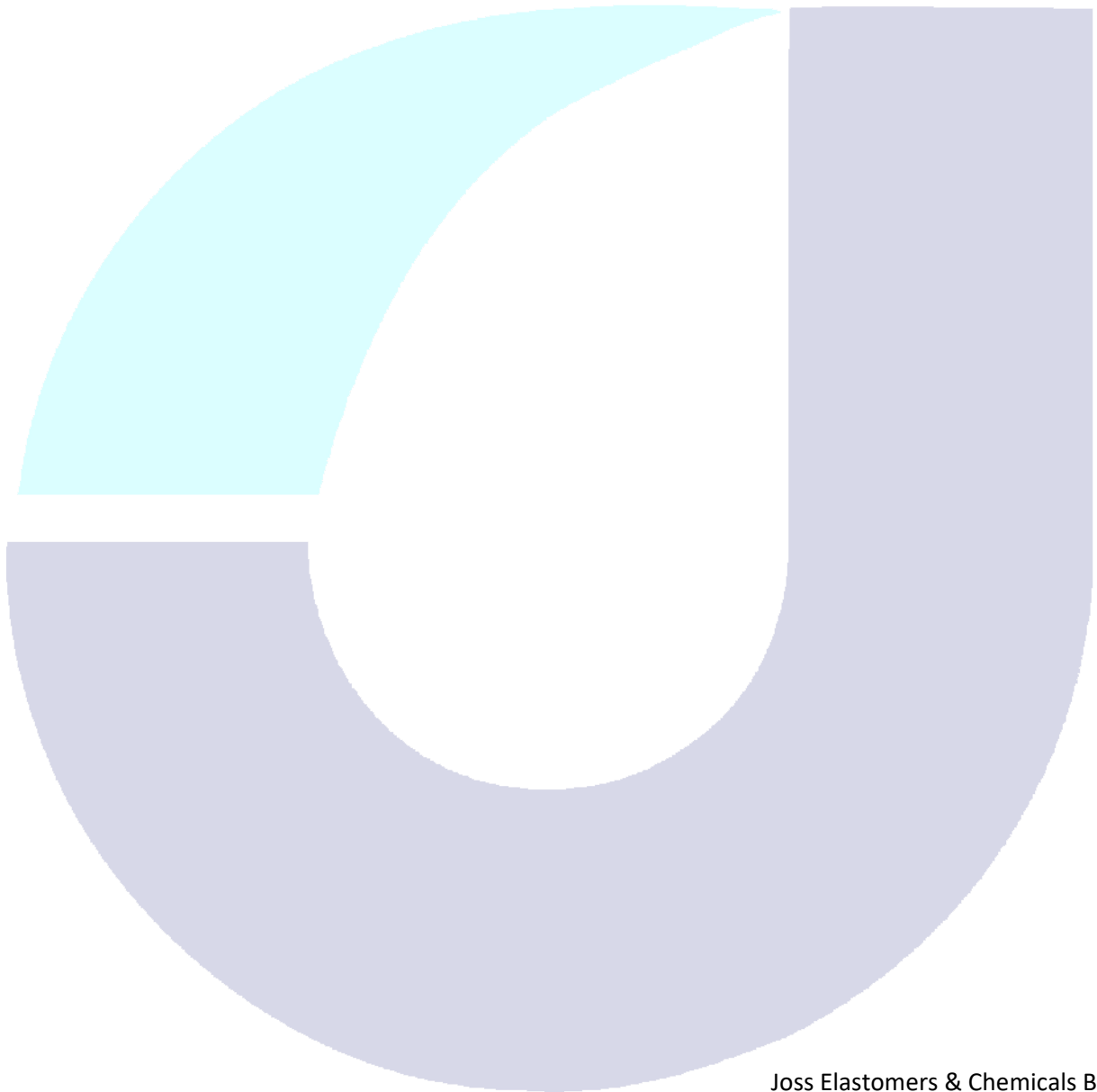


Code of Conduct



Joss Elastomers & Chemicals B.V.
Joss Holding B.V.

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1813 KN Alkmaar
The Netherlands

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Joss Code of Conduct

1. Introduction and General Principles

At Joss, we are committed to fulfilling our responsibility to society, the environment and the climate in all of our activities. We behave fairly towards our business contacts and competitors. We protect the health and rights of our employees in the workplace.

We are dedicated to conducting our business with the utmost integrity and ethical standards. Our code of conduct serves as a compass, guiding our employees, stakeholders and business partners to make responsible decisions and uphold our core values. By adhering to this code, we maintain a culture of ownership, flexibility, teamwork and sustainability.

We comply with the applicable laws and other relevant regulations of the countries in which we operate in all our business actions and decisions. If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct.

2. Global Trade Compliance

Joss requires from Sellers and Buyers to agree to fully comply with all applicable export control and trade sanctions laws, regulations, rules and licences, including without limit those of the U.S. and the E.U. ("Export Control and Sanctions Rules"). For all agreements closed between parties, Joss expects that the Supplier or Buyer will not, and will procure that none of its affiliates will, use, sell, resell, export, re-export, dispose of or otherwise deal with the Goods, directly or indirectly, to any country, destination or person in breach of any Export Control and Sanctions Rules. Furthermore Joss requires that the Seller and Buyer shall ensure that as a result of or in connection with the agreement, no Sanctioned Persons are involved or could benefit from the Agreement.

3. Ethics and Integrity

We are committed to honesty, transparency, and fairness in all our business dealings. Our employees act with integrity, ensuring that their actions align with our values and principles. We do not engage in deceptive practices, fraudulent activities, or any conduct that compromises our integrity.

Anti-bribery and rejection of corruption

We have a zero tolerance approach when it comes to bribery and corruption. We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose. Nor do we, or will we, accept bribes or improper inducements or anything that could be perceived as such. We expect the same from our business partners and third parties we retain or that perform services or deliver business on our behalf. Bribery and corruption is not accepted in any form.

The principles of Joss Anti-Bribery and Corruption Policy state:

1. All forms of bribery and corruption, including facilitation payments, are strictly prohibited.
2. Gifts or entertainment must always be proportionate and reasonable; must have a legitimate purpose; and must not create a conflict of interest or the perception thereof.
3. Employees and third parties may not make gifts or donations to political parties nor offer gifts or entertainment to candidates for political positions on Joss's behalf.
4. Paid and unpaid internships and secondments should be based on merit.
5. Questionable behaviour should be challenged and (suspected) improper payments or activities should be reported directly to the management of Joss.

Fair competition

We respect fair competition. We thus adhere to applicable laws that protect and promote competition, in particular the prevailing antitrust laws as well as other laws that regulate competition.

In dealing with competitors, these provisions prohibit, in particular, collusion and other activities aimed at inflating prices or conditions, allocating sales territories or customers or using prohibitive means to inhibit free and open competition. We do not conclude any agreements with our customers that are intended to restrict their freedom to autonomously determine their pricing and other conditions for resale (determination of pricing and conditions).

Given the fact that it can be difficult to distinguish between prohibited cartels and legitimate collaboration, we shall designate a person who our employees can contact in case of doubt.

Confidentiality and Data Privacy

We understand the importance of safeguarding confidential information, trade secrets, and personal data. We respect the privacy rights of our employees, business partners and stakeholders and we handle sensitive information with the utmost care and confidentiality. We comply with applicable privacy laws and regulations and have adequate data protection measures in place.

Transparency

We comply with the mandatory disclosure and reporting obligations in full and in due time.

Conflict of Interest

We avoid situations that may create a conflict between personal interests and the best interests of the company. Employees must act in the company's best interest and disclose any actual or potential conflicts promptly. We strive to maintain objectivity and make decisions solely based on business considerations.

4. Social Responsibility

We value and respect the dignity, diversity, and rights of every individual. We foster an inclusive environment where all employees are treated with fairness and respect, regardless of their race, gender, age, religion, sexual orientation, or any other characteristic protected by law. Discrimination, harassment, or any form of disrespectful behavior will not be tolerated.

Observance of human rights

We respect and support the observance of internationally recognised human rights, in particular we protect and grant:

- The personal dignity, privacy and personal rights of each individual
- The right to freedom of opinion and expression
- Fair treatment of employees, free from physical and psychological hardship, sexual and personal harassment or discrimination.

Prohibition of forced labour

We strongly condemn forced labour, modern slavery or comparable deprivation of liberty.

Prohibition of child labour

We respect the regulations of the United Nations on human rights and children's rights. In particular, we commit to comply with the Convention concerning the Minimum Age for Admission to Employment (Convention No 138 of the International Labour Organisation) as well as the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Convention No 182 of the International Labour Organisation). If a national regulation concerning child labour provides for stricter measures, these shall take precedence.

Promotion of diversity and equal opportunities

We promote equal opportunities and oppose all forms of discrimination. We treat all people equally, irrespective of gender, age, skin colour, ethnic or cultural origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal traits.

Protection of occupational health and safety

We ensure occupational health and safety in the workplace in line with international standards and the respective national regulations. We implement continuous improvement measures. We ensure that all of our employees receive training in occupational health and safety in the course of their work. Freedom of association and collective bargaining We respect the right of our employees to freedom of association and assembly, as well as the right to collective bargaining and tariff negotiations in accordance with the applicable laws and regulations.

Remuneration and working hours

Remuneration is based on the applicable laws and, where applicable, existing, binding collective agreements and is supplemented by the relevant, national minimum wage laws. Our employees are informed clearly, in detail and on a regular basis about the nature of their remuneration. We comply with the applicable laws and labour standards with regard to the maximum permissible working hours.

5. Ecological Responsibility

Environmental and climate protection

We are committed to minimizing our environmental impact and promoting sustainable practices. We comply with environmental laws and regulations, conserve resources, reduce waste, and seek opportunities to incorporate environmentally friendly practices into our operations. Furthermore, our company's strategy is aligned to the Sustainable Development Goals (SDG's) as divined by the United Nations whereby we actively pursue the most relevant topics which affect our business and environment.

6. Supply Chain

Requirements for suppliers

We shall inform the companies who supply us directly of the principles of this Code of Conduct.

Consumer interests

Insofar as the interests of consumers are affected, we comply with the relevant laws and with appropriate sales, marketing and information practices.

7. Compliance

We shall inform our employees of the provisions of the Joss Code of Conduct and the obligations arising from it. We shall develop and, as needed, adapt our guidelines and processes so that we comply with the principles of the Joss Code of Conduct.

We provide our employees and business contacts with access to a protected mechanism for reporting potential violations of the principles of this Code of Conduct confidentially. If not clear which procedure is applicable, notifications can be send to management@joss.nl.

Conclusion

By upholding this code of conduct, we promote a positive work environment, build trust with our stakeholders, and contribute to the long-term success and sustainability of our company. It is the responsibility of every employee to understand, embrace, and abide by these principles. Regular training, communication, and feedback mechanisms will be in place to ensure the effective implementation of this code throughout the organization. Together, we can achieve our goals with integrity and make a positive impact on the world around us.