

Supplier Code of Conduct



FINNMA

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1. preamble

Finma GmbH (hereinafter referred to as FINMA) has been producing and marketing innovative raw material solutions for paints and coatings, printing inks, adhesives and construction chemical applications for over 40 years.

FINMA recognizes its responsibility within its own company, towards customers and suppliers as well as the environment and society. In addition to certification in accordance with DIN EN ISO 9001, Finma GmbH is also guided by recognized public standards. These include DIN EN ISO 14001, DIN EN ISO 50001, the 17 Sustainable Development Goals (SDG) of the United Nations (UN) and the guidelines for occupational health and safety management of the International Labor Organization (ILO).

Finma GmbH has therefore decided to implement the objectives of the above-mentioned standards in the form of a continuous improvement process to the best of our knowledge and belief and within the scope of our possibilities as an SME.

This Code of Conduct for Suppliers (hereinafter "Code of Conduct") defines our requirements with regard to general business principles and fair competition, labor and social standards, environmental protection and product safety, which FINMA also requires suppliers and service providers to comply with.

The Code of Conduct applies to all suppliers and service providers with whom a direct business relationship exists (hereinafter referred to as "business partners").

2. behavior in the business environment

2.1 Compliance with laws, recognized standards and guidelines

The business partner undertakes to comply with the applicable national laws in all business activities and decisions and observes the relevant internationally recognized standards, guidelines and principles, in particular the principles of the United Nations Global Compact, the Universal Declaration of Human Rights, the conventions of the United Nations Organization and the core labour standards of the International Labour Organization (ILO) as well as the OECD Guidelines for Multinational Enterprises. In addition, the business partner is expected to comply with its internal company guidelines and voluntary commitments.

Compliance with this Code of Conduct and the above standards may not be circumvented by subsidiary agreements, such as contractual agreements or comparable measures.

2.2 Preventing corruption

The business partner undertakes to comply with international and local anti-corruption laws and standards. The business partner may not attempt to influence business partners in a punishable manner, either domestically or abroad, by exchanging gifts or offering or accepting other (monetary) benefits and/or remuneration.

2.3 Antitrust and competition law

The business partner complied with the relevant national and international antitrust laws and the laws against unfair competition. Agreements on prices or conditions with competitors are therefore to be refrained from, as are other agreements restricting competition, which include in particular agreements with competitors for the purpose of market or customer allocation.

2.4 Data protection

The business partner observes the applicable data protection regulatory framework. Personal data may only be collected, processed or used insofar as this is necessary for specified lawful purposes. The use of the data must be transparent for the data subjects; the rights to information and correction and, if applicable, to objection, blocking and deletion must be safeguarded.

2.5 Confidentiality and information security

FINMA's intellectual property rights and other sensitive information are important corporate assets that can exist in both physical and non-physical form and must be carefully protected by our employees. In addition to our self-imposed requirement and interest to adequately protect company-specific information, it goes without saying that FINMA also handles the sensitive information of our customers with care.

and partners and thus ensure confidentiality, security and integrity.

We therefore expect our business partners to handle sensitive information in the same way. The business partner undertakes to implement appropriate state-of-the-art protective measures for sensitive information. In addition, the business partner must inform FINMA immediately of all actual and potential information security incidents that may have an impact on FINMA, the sensitive information or the business relationship. This applies in particular to information obligations to be fulfilled that arise from applicable laws on reporting data protection breaches that affect either FINMA or the business partner or both. The business partner agrees to provide FINMA with appropriate support in the event of information security incidents and/or data protection breaches.

In addition, the business partner undertakes to remedy any weaknesses relating to FINMA that may affect sensitive information or the business relationship in a timely and appropriate manner.

2.6 Export and import

The business partner undertakes to comply with the relevant import and export control laws, in particular sanctions, embargoes and other laws, regulations, government orders and policies controlling the transfer or supply of goods and technology.

3. working standards

3.1 Occupational health and safety

FINMA is committed to preventing accidents in the workplace and work-related illnesses. This serves the well-being and satisfaction of employees and contributes to the long-term success of the company.

We expect our business partners to ensure a safe, healthy and hygienic working environment and to implement the necessary measures to prevent accidents and damage to health that may arise in connection with their activities. Internationally recognized occupational safety standards must be adhered to. In addition, the business partner supports continuous improvements in the working environment and attaches importance to safety-promoting measures and employee training.

3.2 Working hours

Working hours must comply with applicable national law, industry standards or the relevant ILO conventions, whichever is stricter.

3.3 Wages and social benefits

The business partner shall ensure that the wages paid to employees are at least equal to the statutory minimum wage or the minimum wage prescribed in the industry. In addition, social benefits must be provided that correspond to the respective national or local standards.

3.4 Training and qualification

Where possible, the skills of employees are to be promoted at all levels through suitable training and further education measures.

3.5 Complaints mechanisms

It is expected that the business partner will provide appropriate reporting options for employees to report possible unlawful behavior.

4. human rights and fundamental rights

4.1 Human rights

The business partner respects and supports the observance of human rights (see the United Nations Universal Declaration of Human Rights).

4.2 Dealing with child labor

The exploitation of children and young people is not tolerated. The business partner shall observe the regulations of the United Nations on human rights and children's rights and undertakes in particular to comply with the Convention concerning the minimum age for admission to employment (Convention 138 of the ILO) and the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labor (Convention 182 of the ILO). If a national regulation concerning child labor provides for stricter standards, the business partner must observe these as a matter of priority.

4.3 Dealing with forced labor

Any form of forced or compulsory labor will not be tolerated. This means that the business partner will not use labor that is involuntarily performed under threat of punishment, including forced overtime, debt bondage, forced prison labor, slavery or servitude. Furthermore, the business partner undertakes to take action against forced and compulsory labor.

4.4 Freedom of association and the right to collective bargaining

The business partner respects the fundamental right to freedom of association and the right to collective bargaining within the framework of national laws and ensures that this is not impaired.

In the event that national standards restrict the right of association and the right to collective bargaining, the business partner should work to ensure that the free and independent association of employees for the purpose of bargaining is made possible.

4.5 Disciplinary measures and dealing with employees

FINMA expects its business partners to treat their employees with dignity and respect. Sanctions, fines, other penalties or disciplinary measures may only be imposed in accordance with applicable national and international standards and human rights. The business partner shall ensure that no employee is subjected to verbal, sexual and/or physical violence, coercion or harassment.

4.6 Dealing with discrimination

It is expected that the equal treatment of all employees is a fundamental principle of the business partner's corporate policy. The business partner shall refrain from any form of discrimination, for example on the basis of ethnic, national and social origin, skin color, gender, age, religion and ideology, political

activity, membership in an employee organization, disability, sexual orientation or other personal characteristics. The business partner undertakes to maintain equal opportunities. The relevant statutory provisions shall apply.

5. environmental protection

5.1 Environmental and climate protection

The protection of people and the environment is an integral part of our corporate policy. FINMA expects our business partners to minimize their environmental impact and to observe and continuously improve environmental and climate protection in accordance with applicable international standards and legal requirements. This includes avoiding emissions and waste and taking general steps to increase resource efficiency. To this end, suitable and verifiable measures must be taken and management systems (e.g. DIN EN ISO 14001 or equivalent) must be operated to ensure and promote environmental and climate protection. FINMA expects its business partners to develop and manufacture products as well as package and transport them in a safe and environmentally friendly manner.

Business partners are selected and evaluated taking into account environmental and safety aspects. Successful cooperation between FINMA and its business partners is based on trust, transparency, reliability and fairness.

5.2 Waste and emissions

The business partner is expected to maintain procedures and systems to ensure the safe handling, transportation, storage, recycling, reuse and management of raw materials and waste. Any generation or disposal of waste and any release of substances into the air or water that is likely to have a negative impact on the environment is prohibited.

The risk to human health or the environment must be reduced as far as possible and the substances must be handled, controlled and/or treated in an appropriate manner before being released into the environment. The business partner is required to use appropriate procedures and systems to prevent or minimize the accidental or diffuse release or leakage of pollutants into the environment. The business partner is expected to maintain procedures and systems that sustainably optimize the use of relevant resources such as energy, water and raw materials.

5.3 Process reliability

The business partner is expected to maintain a management system to control work processes in accordance with recognized safety standards. If necessary, specific risk analyses must be carried out for systems. The business partner shall take measures to prevent incidents such as chemical leaks and/or explosions at all facilities.

5.4 Land rights, forest and water rights and forced eviction

The business partner is required to avoid forced evictions and the withdrawal of land, forests and water when acquiring, developing or otherwise using land, forests and water. FINMA expects the business partner to comply with and implement all relevant national and international legal and regulatory requirements in this regard.

6. product responsibility

6.1 Product safety

The relevant country-specific laws and legal requirements must be complied with. The business partner undertakes to provide FINMA with all relevant product information, in particular on the use (processing instructions or assembly instructions as well as occupational safety measures) and, if necessary, on the disposal of its products in good time before delivery/service. Furthermore, complete documentation is required to comply with laws such as safety data sheets, labeling regulations, etc. Information provided by FINMA must be included in the relevant documents.

6.2 Clinical studies and animal welfare

The business partner is expected to conduct clinical studies and/or animal testing in accordance with international guidelines and applicable national and local regulations. In general, the 3Rs principle (Replace, Reduce, Refine) must be applied to animal testing. The aim is to replace animal testing with scientifically valid, officially recognized in-vitro methods.

6.3 Conflict minerals

The business partner shall ensure that no products are delivered to FINMA that contain metals whose source minerals or derivatives originate from conflict and high-risk areas where they are used directly or indirectly to finance or support armed groups.

contribute. EU Regulation 2017/821 on the definition of due diligence obligations in the supply chain applies.

7. management systems

7.1 Application of management systems

The business partner shall apply or introduce a management system whose scope of application relates to the content of this Code of Conduct. The management system shall be designed to ensure the following: (a) compliance with relevant laws, regulations and customer requirements relating to the Business Partner's operations and products; (b) compliance with this Code of Conduct; and (c) identification and mitigation of operational risks relating to this Code of Conduct. It should also contribute to continuous improvement.

In addition, the management system should contain the following elements.

7.2 Commitment of the company

Declarations of principle on social and ecological responsibility in the sense of a corporate policy with which the business partner expresses its commitment to compliance with laws and regulations and to continuous improvement. The declarations of principle must be confirmed by the management and must be made known within the company in the respective national language, e.g. by means of a notice board.

7.3 Accountability and responsibility of the management

The business partner shall clearly designate managers and representatives of the company who are responsible for the implementation of the management systems and the associated programs. The status of the management system must be reviewed by the management at regular intervals.

7.4 Legal provisions and customer requirements

A process to identify, monitor and better understand relevant regulations and customer requirements, including this Code of Conduct.

7.6 Risk assessment and risk management

The business partner maintains a process to determine legal compliance in the areas of environmental, labor practice and health and safety compliance. Determining the relative importance of each risk and implementing appropriate procedural and physical controls to monitor the identified risks and ensure regulatory compliance.

8 Implementation and requirements

8.1 Implementation

The business partner shall make the requirements of this Code of Conduct known to its own employees and to its direct suppliers and service providers in order to ensure compliance with it.

If the business partner has drawn up its own Code of Conduct or a company policy with the requirements listed in this Code of Conduct, evidence of compliance with these must be provided. If the business partner does not have its own code of conduct etc., it should commit itself to this Code of Conduct and comply with the stated requirements.

Any violations identified by the business partner must be remedied immediately and any potential improvements must be examined in detail. Finma expects its business partner to work towards the consistent dissemination of the requirements of this Code of Conduct in its supply chains.

8.2 Information and communication

This Code of Conduct can be viewed at any time on the Internet at <http://www.finma.de/coc-en> and printed out from there and should be made available by the business partner to the relevant employees.

8.3 Monitoring and information

FINMA reserves the right to verify compliance with the above requirements either by FINMA itself, by independent third parties, through certificates and statements or subject-specific on-site audits.

If the business partner has serious concerns that something does not comply with this Code of Conduct, he has to inform FINMA. The business partner can contact FINMA's Executive Board or info@finma.de to do so.

8.4 Sanctions and remedial measures

Any material breach of the aforementioned obligations will be considered by Finma as a breach of contract by the business partner and will be legally assessed in each individual case. If possible, we will give the business partner the opportunity to take appropriate remedial action.

Thank you for your commitment and your contribution.



Gerd-Rüdiger Vössing
Business owner



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Confirmation of the FINMA Supplier Code of Conduct

This confirms compliance with the rules set out in the FINMA Supplier Code of Conduct:

_____, the _____

(Place, date)

Company:

Stamp (optional):

Signature(s) of the authorized representative(s):

.....
(Signature)

.....
(Signature)

Name: _____

Name: _____

Title: _____

Title: _____