

Policy Statement on Respect For Human Rights

Since 2010, as joint signatories of the United Nations Global Compact, we have been supporting its Ten Principles in the areas of human rights, labour, environmental protection and anti-corruption and since then we have implemented them into our corporate policy, culture and day-to-day business. We annually report on the progress made in these areas. Moreover, we base our operations on the United Nations Human Rights Council's Guiding Principles on Business and Human Rights.

Since 2016 EcoVadis has helped us with systematically rating our performances in the areas of environment, human rights, labour, ethics and sustainable procurement. Since 2019 we have ensured that direct suppliers also present us any EcoVadis certifications, creating transparency in the purchasing process. As a leading specialty chemicals enterprise we desire to expand and enforce our position in the long term. For this purpose, our corporate culture and our joint values are essential. Responsibility towards people and our self-commitment to fairness and tolerance are part of our fundamental values. These values are embodied in the ALTANA Identity. Moreover, our values and our understanding of ethical conduct are described in our Code of Conduct setting binding global standards for all our employees.

"We" are ALTANA AG and all companies affiliated with ALTANA AG, including but not limited to BYK-Chemie GmbH, Eckart GmbH, ELANTAS GmbH and ACTEGA GmbH as well as their subsidiaries.

In addition to our efforts made and successes achieved over many years in promoting human rights and environmental protection, for example in reducing our carbon emissions and ensuring safety at work, we are now focusing on 13 risks for human rights and the environment using a special risk management system to which this Policy Statement refers:

- Child labour
- Forced labour
- Slavery
- Safety at work
- Freedom of association
- Discrimination
- Adequate living wage
- Pollutions hazardous to livelihood
- Eviction
- Deploying of security forces jeopardizing human rights
- Production, use and disposal of mercury
- Handling of persistent organic pollutants
- Export and import of hazardous wastes.¹

Risk Management System

This risk management system aims at preventing and minimizing these risks to human rights and environmental concerns as well as at ending violations of these human rights and environmental concerns or at least at minimizing their extent. For this purpose we review our own activities and those of our suppliers in Germany and abroad, primarily the activities of our direct suppliers. We will include

¹ Each of the 13 risks within the meaning of section 2(2) and (3) of the German Act on the Corporate Supply Chain Due Diligence (LkSG – Gesetz über die unternehmerischen Sorgfaltspflichten in Lieferketten).

indirect suppliers (i. e. suppliers of our direct suppliers) as far as we become aware of any breach of duty by them with regard to human rights or the environment.

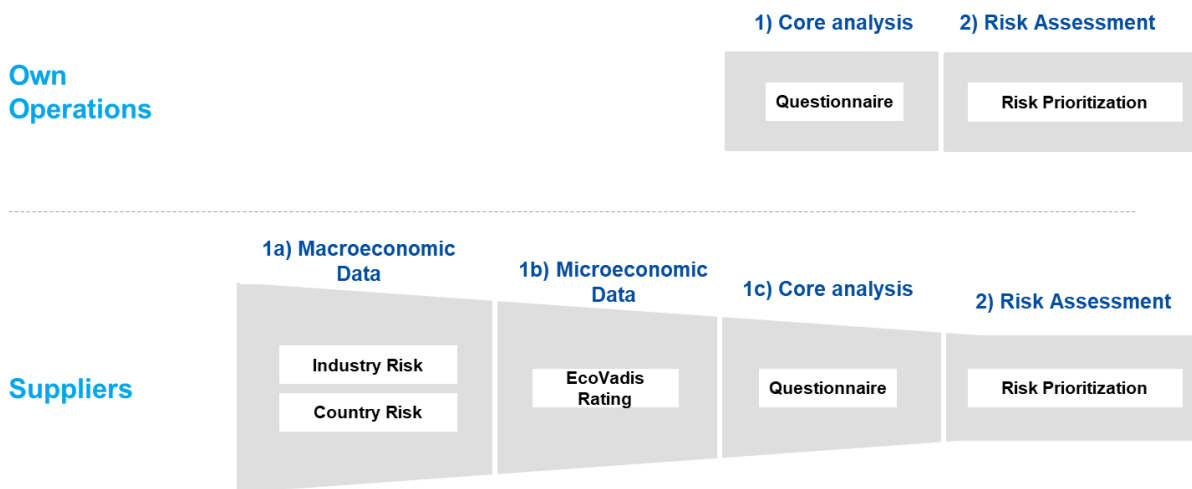
Our Risk Manager ESG Supply Chain is responsible for this risk management system.

Risk Analysis

First of all, we identify, weight and prioritize the risks within a risk analysis. In this context, we differentiate between risks arising from our own operations and risks at direct suppliers.

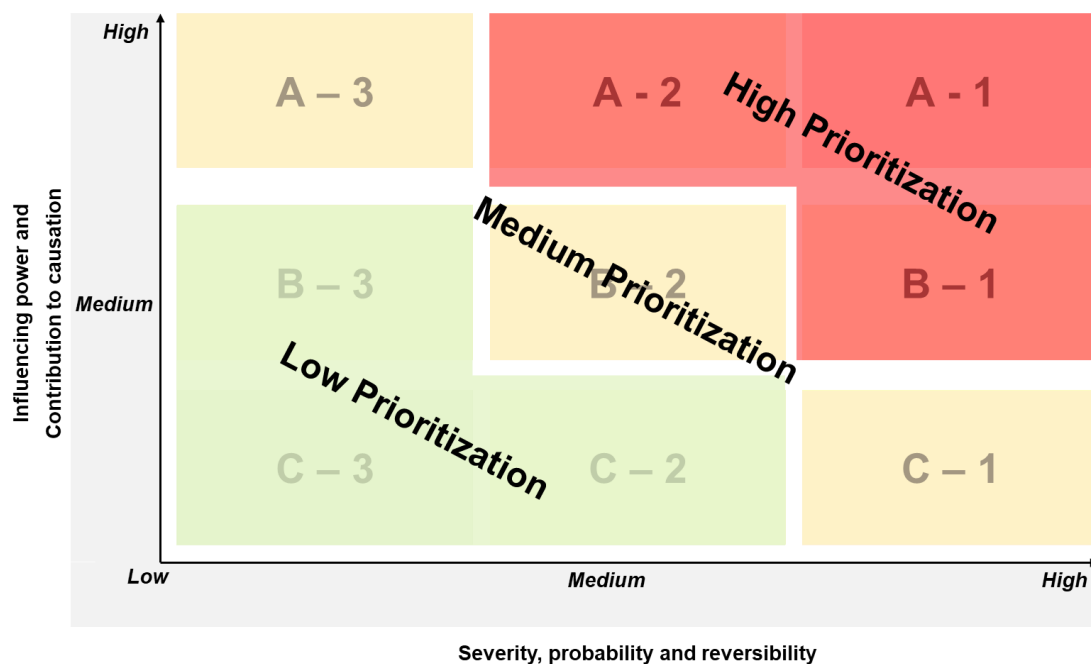
For direct suppliers, in a first step the risk arising from the countries and industries is assessed. In a second step, the direct suppliers which do not have a low risk only are differentiated according to product group. Third, direct suppliers can improve their risk assessment by presenting an EcoVadis rating for the sub-areas "Labour & Human Rights" or "Environment", respectively. We will specifically assess direct suppliers still exposed to a medium or high level of risk on the basis of their responses given in a questionnaire. Particular groups of direct suppliers will continuously be reviewed as to whether there is any information from particular publicly accessible sources indicating that they are exposed to a higher risk. We will adjust their risk assessment correspondingly.

Within the ALTANA Group itself we specifically analyse the risks of each group company and each location. Each group company and each location is requested to state its specific risk in a questionnaire. We finally assess the specific risk of each group company and each location on the basis of the responses given.



Subsequently, the risks assessed in such a way are weighted and prioritized both for the direct suppliers and the ALTANA Group, using a multitude of criteria which in particular reflect our influence,

the severity, probability and reversibility of a potential violation as well as the kind of our theoretical contribution to causation.

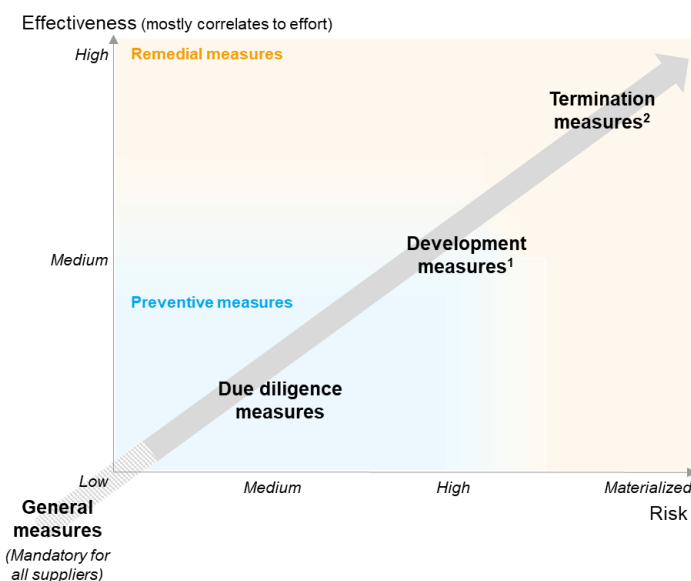


The results from this risk analysis, in particular the risks we consider the most urgent, have not yet been determined as per 1 January 2023. We are starting today with the annual risk analysis and will update this Policy Statement as soon as the risk analysis has been concluded. The updated Policy Statement will then also identify the risks having priority for us with regard to human rights and the environment.

Preventive Measures

Each risk identified in the risk analysis will be mitigated by taking one or several preventive measures according to the prioritization and weighting of the risks identified. For this purpose, a catalogue including preventive measures in three categories is available: due diligence, development and termination. Due Diligence preventive measures aim at clarifying the facts underlying the identified risk and should be taken in cases where it has not yet been clarified to what extent the risk actually exists and how it has to be countered adequately, if required. Development preventive measures serve the purpose of minimizing the identified risk including the prevention of a violation of a duty relating to human rights or the environment. Normally development preventive measures are taken. Termination

preventive measures bring about a separation from a direct supplier on short notice or a comparable complete remedy of the identified risk in the short term.



Remedial Measures

Each breach of a duty occurred or imminent in relation to human rights or environmental issues has to be addressed immediately by taking remedial measures which either (i) ends or prevents the violation or at least minimizes its extent in case of direct suppliers, (ii) ends or prevents the violation within our group companies in Germany and (iii) normally ends or prevents the violation in our group companies outside Germany.

Complaints Procedure

All parties involved, employees as well as suppliers or other third parties, may use the ALTANA Whistleblowing System to inform us of any infringement of this Policy Statement or other adverse human rights or environmental impacts or the breach of any duty with regard to human rights or environmental issues. If desired, we ensure the anonymity of the whistleblower and will protect him or her from retaliation. More detailed information is accessible under <https://www.altana.de/unternehmen/corporate-guidelines/-/compliance-altana-ag.html>

Assessment of Effectiveness

We assess the effectiveness of the preventive measures and remedial measures at least once a year. While each purchaser or Corporate Environment, Health & Safety and Corporate Human Resources in our own operations is responsible for the measures as such, an independent Risk Manager ESG Supply Chain is responsible for assessing their effectiveness. If Risk Manager ESG Supply Chain ascertains that the measures taken are ineffective, they will ensure that other measures are taken. The same applies to the assessment of the complaints procedure's effectiveness to be carried out at least once a year jointly by the Risk Manager ESG Supply Chain and the Chief Compliance Officer.

Reporting

The Risk Manager ESG Supply Chain will regularly report on the risk management system to the management board of ALTANA AG, the presidents of the divisions BYK, ECKART, ELANTAS and ACTEGA and other functions within the group.

ALTANA AG will publish an annual report on the risk management system.

Information, Training, Internal Audit, Year-End Audit

We have provided for rules in which way we inform and train our employees, our direct suppliers and other stakeholders on this risk management system. These rules moreover provide that our Internal Audit has to assess regularly whether this risk management system is effective and appropriate. As part of our Compliance Management System, this risk management system will also be included in the annual year-end audit of ALTANA AG.

What we expect from Employees and Suppliers

We expect from all our employees that they help to identify and minimize human rights and environmental risks and help to prevent and bring to an end any breach of duty with regard to human rights and environmental obligations in performing their functions within the scope of this risk management system and that they cooperate with their colleagues who are primarily responsible for the risk management system.

We expect that our suppliers respect the general human rights and our common environment, irrespective of the country of the world in which they are engaged in business. We respect the law, cultures and customs of other countries, however, we expect that our suppliers globally cooperate with us, if required, to identify and minimize human rights and environmental risks and to prevent any breach of duty with regard to human rights and environmental issues.

Wesel, 1 January 2023

ALTANA AG

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Management Board

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Member of the
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