

FUCHS GROUP

Code of Conduct

MOVING YOUR WORLD



Code of Conduct

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Dear Employees, Dear Customers, Business Partners and Stakeholders,

We, the FUCHS Group, are an internationally operating corporation that meets the challenges of global competition head-on and assumes entrepreneurial as well as social responsibility. This responsibility covers legal, social, environmental, and ethical aspects that we as a company need to consider in order to be successful. We undertake to manage our business in a fair, responsible, and transparent manner and ensure that our activities in all the countries that we work in are founded on the respect for law and order.

This Code of Conduct is based on our jointly developed values and applies without exception and worldwide to all members of company organs, executives, and employees (FUCHS employees) of the FUCHS Group. The FUCHS Group, as far as this Code of Conduct is concerned, includes all direct and indirect majority holdings of FUCHS PETROLUB SE. Hence, this Code of Conduct contains the core principles that govern the actions of FUCHS. The commitment to respect these principles forms a bond between all our employees irrespective of national borders and cultures. The Code of Conduct constitutes the framework within which we make decisions in the company; it provides the policies that govern our actions and against which our

actions as a company are measured. The Code of Conduct is the basis for other corporate policies, which concretize it further.

This Code of Conduct underpins our conviction that we, as a corporation, can only be successful if we base our actions on the following core values:

▪ Trust

Trust is the basis of our identity.

▪ Integrity

We respect law and order and act in accordance with our internal corporate policies.

We believe in moral values and abide by our Code of Conduct.

▪ Creating value

We deliver leading technology and a first-class service to our customers.

We identify and create added value.

We provide space for innovations and explore new paths.

We function as entrepreneurs within an enterprise.

We give our employees responsibility and take them at their word.

▪ Respect

We acknowledge our responsibility towards various stakeholders, society, and the environment.

We show appreciation and recognition.

We act with fairness towards our partners and employees.

We foster an open-minded culture of discussion.

▪ Reliability

We keep our promises.

We are committed to technical leadership.

We want to continue with our success story.

We act with determination and transparency.

The trust of our business partners, shareholders, the authorities, and the public is a special and precious commodity that requires lawful and responsible actions based on integrity. This trust is important for the reputation and success of our corporation.

We know that we are not measured by what we say but by how we act.

Mannheim, April 2022

FUCHS PETROLUB SE

Stefan Fuchs

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1 Social responsibility

1.1 Responsibility for the reputation of the Group

Compliance with valid laws and legal regulations is part of our identity. FUCHS complies with the respective applicable laws at local, national as well as international level.

FUCHS is aware of its responsibility towards society and undertakes, without exception, all its business activities based on that responsibility. This means, first of all, respect for the laws valid from time to time.

In addition, FUCHS has drawn up policies and rules that concretize the standards governing our cooperation with business partners and authorities. FUCHS expects and endeavors to ensure that these rules and principles are also adhered to by our business partners that include, for example, suppliers, customers, service providers, distributors, advisors, agents as well as other third parties.

In order to avoid breaches of statutory obligations and internal corporate rules, FUCHS has set up a group-wide compliance organization that serves as a port of call for all employees and executives. This compliance organization is managed by the Chief Compliance Officer (CCO) who reports directly to the Board. In addition, every group company has a Local Compliance Officer who is personally responsible for compliance issues and acts as a port of call for the CCO. At regional level, there are additional Regional

Compliance Officers for the respective world regions. Another communication channel that forms part of our integrated compliance organization is our internet-based "FUCHS Compliance Communication" whistleblower system, which can be used to anonymously report (potential) misconduct.

1.2 Responsibility for basic social rights

FUCHS supports the compliance with international conventions for the protection of people's civic, political, economic, and social rights as well as for the protection of the environment. This includes, among other things, the General Declaration of Human Rights of the United Nations, the Manifesto of the International Labor Organization (ILO) and the initiative for sustainable and responsible corporate governance (UN Global Compact). As a globally active company we accept our responsibility and do everything we can, within the framework of our corporate policies, to ensure compliance with internationally recognized standards for human rights and the environment when it comes to our supply chain.

Hence, FUCHS also expects those involved in its supply chain to act with integrity and respect sustainability, which is why we undertake to only collaborate with suppliers who are aware of these standards and act accordingly.

a. Protection of human rights

FUCHS forbids all forms of slave labor, human trafficking, illegal child labor, illegal penal labor, and the physical abuse of employees.

Based on the respective statutory provisions, FUCHS undertakes to abide by the principles of equal opportunities concerning the recruitment and promotion of employees. We furthermore respect the rights of our employees to equal treatment irrespective of ethnic origin and nationality, religion and ideology, gender, and sexual orientation, political or trade union activities, age, illness or disability or other personal characteristics. Discrimination of any kind shall not be tolerated by FUCHS.

FUCHS furthermore condemns any kind of bribery and corruption and respects the freedom of association as well as the right to collective bargaining negotiations.

b. Mutual respect

Every FUCHS employee must be treated fairly and respectfully. Executives encourage employees through open and intensive communication, transparency, and teamwork. Every FUCHS employee shall be appreciative of as well as respectful and open towards colleagues, undertake to avoid any type of discrimination and foster relationships that are based on fairness. Violence at the workplace, threatening behavior, intimidation, physical attacks, and any form of sexual harassment will be sanctioned.

1.3 Sustainability and protection of the environment

Sustainability, the protection of the environment as well as the improvement of living and environmental conditions are important corporate goals for FUCHS. FUCHS endeavors to continually optimize its corporate governance, ensuring that it meets the three benchmarks of economic, ecological, and social sustainability. Sustainable growth that guarantees the protection of the environment, a sparing use of its natural resources and respect for the living conditions of subsequent generations is a top priority for FUCHS.

A summary of our principles governing sustainable management can be found in our comprehensive sustainability policies that, as all policies listed in this Code of Conduct, can be downloaded from our company's home page.

We are very much aware of the scarcity of resources and our responsibility towards future generations, which is why we as a company pay particular attention to these issues. FUCHS does everything it can to ensure that its products and manufacturing processes meet these requirements across its entire value chain. Every FUCHS employee is personally responsible for the sustainable use of resources and the consistent reduction of emissions resulting from the company and its products and shall act accordingly at his

place of work. The intention is to increase the resource efficiency of the material used and limit the environmental impact of one's own commercial activity to a minimum. Considering these aspects, we pay particular attention to a responsible use of resources such as energy, water, construction, and raw materials as well as to a reduction of the quantity of waste generated with the aim of continually reducing the emissions of FUCHS.

1.4 Leadership and management responsibility

The respect of law and order is a matter of course to us even if, as a result, certain business relationships do not materialize, or personal goals are not met. When it comes to compliance with statutory rules and internal policies, our executives must set an example. Responsible management and cooperation require decisions that are transparent and plausible.

It is the particular responsibility of our executives to prevent, within their respective field of responsibility, any breaches of laws, this Code of Conduct, and internal policies, which could have been avoided or made much more difficult through open communication and appropriate supervision.

Executives must fulfil their organizational and supervisory duties by, in particular,

- leading by example and explaining to their employees that statutory provisions, this Code of Conduct, and internal policies must be adhered to, and that non-adherence will not be tolerated; and
- by ensuring compliance with statutory rules and internal policies.

1.5 Party political activities

On principle FUCHS does not get involved in party political activities. This also applies to the financial support/sponsorship of parties, political organizations, and their representatives as well as activities or events performed in the name of FUCHS.

Our employees as private individuals and citizens are free to take part in political processes in their spare time.

2 Occupational health & safety and environmental protection

In matters of occupational health & safety and environmental protection, FUCHS must comply with various national and international rules that vary according to where the respective sites are based and that we as a company naturally comply with.

Every FUCHS employee must know of and comply with the applicable laws, regulations and internal policies on occupational health and safety. All employees are called upon, in their own as well as their colleagues' interest, to be constantly vigilant and aware of the potential risks associated with their work and work environment. Together we endeavor to keep potential dangers and risks to an absolute minimum and reduce any risks that we have become aware of.

Safety at work has the greatest priority for FUCHS. We ensure safe working conditions that are in line with applicable regulations governing occupational health and safety. We respect these rules of occupational safety and regularly monitor safety standards to make working conditions safe and avoid health risks. Our employees are informed of the relevant rules and receive instructions on how to comply with them.

Compliance with the laws and regulations that apply to environmental protection is a task and obligation that all of us take very seriously.

3 Cooperation with business partners and third parties

3.1 Fair competition

Competition and anti-trust laws ensure fair and genuine competition. In its business transactions FUCHS always observes and complies with these laws. Every one of our employees is obliged to adhere to the rules of fair competition and abide by the provisions set out in our anti-trust policy.

Acting in a way that ensures fair competition means, for example, that no FUCHS employee is allowed to enter into an arrangement with competitors that leads to the fixing or coordination of prices, conditions, capacities, the allocation of customers, markets, personnel and production programs. They must also refrain from exchanging such information with competitors. FUCHS also acts fairly when dealing with suppliers, customers and distributors and does not unduly restrict their activities in the marketplace. In markets where FUCHS has a dominant position, FUCHS shall refrain from abusing such position.

In cases where employees are unsure as to whether a matter falls under the anti-trust policies, it is recommended that they contact the Group Compliance Office or the competent legal department as early as possible.

3.2 Anti-corruption

We are not prepared to do business at any price. In a competitive environment, FUCHS prefers to rely on the quality and value of its products and services and chooses its business partners exclusively based on competitive criteria (such as quality, price, and suitability of service). Through clear policies, business processes and internal controls we support national and international efforts aimed at ensuring that competition is not undermined by corruption. It is essential to avoid even the appearance of offering inducements to our business partners.

As a general rule FUCHS employees must neither offer nor request, neither accept nor grant, neither promise nor be promised benefits by third parties to generate business opportunities or influence business proceedings in illegal ways. As to the rules and regulations applicable at FUCHS we refer to our anti-corruption policy.

It is strictly forbidden to offer payments, inducements or other benefits in kind as well as invitations to officials, civil servants, politicians and other employees and representatives of state-owned or state-controlled enterprises and public institutions.

3.3 Expectations vis-à-vis business partners

FUCHS also expects its business partners to comply with the principles set out in this Code of Conduct. In order to do business with us, our business partners must – as do we – adhere to the following principles and values and ensure their adherence in their own supply chain:

- Adhering to all applicable laws, regulations, and policies
- Abstaining from corruption and bribery
- Observing the human rights of their employees
- Refraining from the use of forced labor, child labor and slavery
- Respecting the freedom of coalition
- Assuming responsibility for the health and safety of their employees
- Engaging in sustainable production that makes a sparing use of resources.

3.4 Distributors, consultants, and agents

In order to sell its products and services FUCHS also uses independent distributors, consultants and agents (distribution partners), who also make an important contribution to the sale of products. If distribution partners were to use illegal selling practices, such practices harm the reputation of FUCHS. Under certain circumstances, illegal practices used by third parties may be attributed to FUCHS, and result in (co-)liability. Hence, FUCHS will do whatever is necessary to ensure that its distribution partners comply with the statutory rules. We meet our duty of care among other things by having implemented selection processes for the use of distribution partners.

3.5 Foreign trade and export control

National and international laws restrict or ban the importation, exportation or the trading of certain goods, technologies or services, the handling of certain products as well as the associated capital and payment transactions. The restrictions and bans may, among other things, be due to the quality or the intended use of the goods, the country of origin or use or the business partner himself.

All FUCHS employees are obliged to comply with all applicable rules, among others those that cover foreign trade and export control laws, tax and customs laws, money laundering laws and anti-terror laws. This applies specifically to those FUCHS employees who manage the importation and exportation of goods, technologies, and services.

4 Avoidance of conflicts of interest

4.1 Conflicts of interest

Every FUCHS employee is obliged to make business decisions exclusively in the best interest of the company, separate private interests from corporate interests and always remain loyal to FUCHS. Any type of conflict of interest is to be avoided and, in cases of doubt, must immediately be disclosed to the superior.

The following situations may signify conflicts of interest:

- The private interests of a FUCHS employee clash with those of FUCHS.
- The professional judgment or conduct of a FUCHS employee risks being affected by personal interests (e.g., personal relationship with external parties or contributions made by external parties such as gifts, rebates, etc.) to such an extent that the employee no longer makes business decisions that exclusively benefit FUCHS or business decisions risk being adversely affected.

- FUCHS employees acting on behalf of FUCHS PETROLUB conclude contracts with persons that they are close to (e.g., family members and friends) or with companies where they or persons close to them have a (direct or indirect) shareholding. The common practice of acquiring minor shareholdings in listed companies is exempt.
- A FUCHS employee also works for a business partner or a competitor of FUCHS.

4.2 Noncompetition clause

In addition to their work for FUCHS, FUCHS employees are not allowed to run or work for a company as employees, consultants or in another capacity, which, in part or in its entirety, is a direct or indirect competitor of FUCHS. This ban on competition also includes other competing activities.

4.3 Shareholdings in other companies

FUCHS employees have neither direct nor indirect (e.g., via family members) holdings in companies that have a business relationship with FUCHS. The common practice of acquiring minor shareholdings in listed companies is exempt.

5 How to responsibly deal with company property

Every FUCHS employee is duty-bound to protect the material and immaterial assets of FUCHS and to responsibly manage company property. Company property includes all installations and facilities as well as intangible values such as know-how and industrial property rights. Any abuse and waste of company resources damages the operational and financial capacity of the company. Only the efficient use of all resources at all levels can secure the long-term success of the company.

6 How to responsibly deal with information

6.1 Reporting and external communication

Our reporting is at all times conducted promptly, truthfully, completely and in compliance with the applicable standards and rules. This applies irrespectively of the type of reporting and the respective group of recipients. Every FUCHS employee takes the greatest possible care when it comes to reporting. This duty of care and responsibility also includes the documents produced by third parties.

Making negative statements or defamatory comments about the company, business partners, competitors, or colleagues – in particular on social media – goes against our values and is not permitted.

The media as multipliers are particularly important for the presentation of the company to the outside world. Certain contact persons within FUCHS have been appointed to deal with the media. Any inquiries made by the media or other persons who do not work for the company must be passed on to these contact persons or the Board.

6.2 Protection of business secrets

Our business secrets are a precious commodity; they ensure that we have a competitive advantage over our competitors. Every FUCHS employee is obliged to generally protect any information of FUCHS, its business partners and competitors, refrain from disclosing it to unauthorized persons and only grant access to such information if such disclosure is required for business reasons.

Confidential information covers, in particular, strategic, financial, and technical information, which may include details regarding the organization of the company, prices, markets, customers, suppliers, marketing strategies, business and financial plans, figures compiled for internal reporting, formulations, technologies, etc.

6.3 Data protection and safety of information

FUCHS observes the rights of its employees and third parties concerning their personal data. The company undertakes the necessary measures to ensure that personal data is only processed in compliance with the respective applicable statutory rules and regulations.

When processing personal data FUCHS shall ensure that this process is transparent for the parties concerned and that the statutory rights concerning the personal data of the parties concerned shall be upheld.

To ensure the safety of data processing FUCHS has carried out appropriate technical and organizational measures. This guarantees the confidentiality, integrity, availability and verifiability of the systems and services in connection with data processing and, in particular, the prevention of unauthorized use.

6.4 Insider rules

FUCHS employees may, within their working environment, gain knowledge of information about FUCHS that is not in the public domain and that investors, if they were aware of it, consider to be essential for their investment decision in FUCHS financial instruments (e. g., FUCHS shares). Based on the law on insider information, such insider information must not be used and must only be managed in the strictest of confidence. Hence, insider information must not be used to trade with FUCHS financial instruments on one's own account or on behalf of others; it must not be disclosed to third parties and those in possession of insider information must not recommend the trading with FUCHS financial instruments to third parties. Those who act in violation of the law on insider information may be personally subject to criminal or civil prosecution. We have set out the principles on how to manage insider information in our insider policy.

7 How to deal with the Code of Conduct

The Code of Conduct is binding for all group companies and for every FUCHS employee. Every FUCHS employee has the right to insist that the rules set out in the Code of Conduct be applied to him. Management shall endeavor to ensure that all employees know and adhere to the Code of Conduct.

FUCHS executives shall actively encourage the implementation of this Code of Conduct in their respective fields of responsibility, ensure compliance and live up to the principles and values set forth herein. They and the respective competent Compliance Officers are the first port of call for questions and help the employees act lawfully and in line with our values. The management calls upon you as an employee of FUCHS to read this Code of Conduct, gain an understanding of it, align your own behavior to its principles and thereby act with integrity.

The Code of Conduct cannot regulate every detail relating to the standards, procedures, and provisions of our group. If FUCHS has approved specific policies, instructions, and provisions for certain cases, they complement this Code of Conduct and are binding.

Every FUCHS employee is called upon to immediately notify his superior, the competent Compliance Officer or

the competent department upon receiving information concerning potential or known breaches of the applicable law, this Code of Conduct, or the internal policies. In addition, FUCHS offers its employees and external parties the option to use its Internet-based whistleblower system “FUCHS Compliance Communication” to report observations or tips concerning potential breaches or suspicious cases and to enter into a dialogue with the competent Compliance Officer. The anonymity of the whistleblower shall be guaranteed during the entire process. The portal can be accessed at

→ www.bkms-system.net/FUCHS-Compliance-Communication

The tips and information received will be treated and processed confidentially and with due care. FUCHS shall inform the whistleblower within seven days and confirm receipt of the notification. If there is a well-founded suspicion that a breach has been committed, the appropriate Compliance Officer will contact the competent departments and take the necessary measures to clear up the matter and sanction any breaches established. Within three months after the notification FUCHS shall inform the whistleblower as to how his report has been managed and what measures have been taken.

Reporting breaches or misconduct will not adversely affect the whistleblower unless he verifiably and knowingly disclosed or reported false information.

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