

FUCHS GROUP

Anti-Corruption Policy

MOVING YOUR WORLD



Anti-Corruption Policy

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Preface

Dear Employees,

Compliance with applicable national and international laws and statutory regulations is an essential part of the identity of FUCHS, which is also reflected in the Code of Conduct. The prevention of and the fight against corruption are therefore of particular significance as breaches of the law can lead to large fines, financial penalties, disgorgements, obligations to pay damages and criminal prosecution. Furthermore, it may do considerable damage to the public reputation of FUCHS.

Our anti-corruption policy (hereinafter referred to as "Policy") contains the rules and regulations that must be observed to ensure compliance with applicable anti-corruption laws when dealing with business partners and public officials. All members of company organs, executives, employees, and representatives of FUCHS must, as far as their business activities are concerned, neither

directly nor indirectly offer, promise, or confer to third parties an unjustified advantage in the form of money or other services nor demand, be promised or accept such advantage. You as a FUCHS Employee are therefore called upon to strictly avoid the mere appearance of improbity and incorrectness. While it is obvious that this Policy cannot cover every possible scenario, it does stipulate a general scope for action and offer standards of conduct for the prevention of corruption and conflicts of interest.

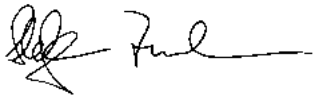
In addition, you may use the internet-based "FUCHS Compliance Communication" whistleblower system – even anonymously if you so wish – to provide tip-offs and report matters that you suspect of being connected with corruption or further compliance-relevant breaches in your company. If you have questions or need further information, please contact the competent Compliance Officer or

the Group Compliance Office. You can find further details at the end of this Policy.

Please read this Policy thoroughly and interiorize the prescribed standards of conduct so that you always act in accordance with this Policy and, overall, with integrity on behalf of FUCHS and yourself.

Mannheim, June 2022

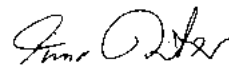
FUCHS PETROLUB SE



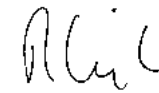
Stefan Fuchs



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1 Goals and scope of this policy

1.1 Scope

This Policy shall apply without exception and worldwide to all members of company organs, executives, and employees of the FUCHS Group (hereinafter referred to as "FUCHS Employees"). The FUCHS Group (hereinafter referred to as "FUCHS"), as far as this Policy is concerned, includes all direct and indirect majority holdings of FUCHS PETROLUB SE. The principles set forth in this Policy also apply to intermediaries, consultants and other third parties such as service providers, agents, temporary staff, and intermediaries who, either directly or indirectly, undertake work on behalf of FUCHS.

1.2 Goals

This Policy includes standards of conduct for FUCHS Employees for the prevention of corruption. Its purpose is to help FUCHS Employees behave in accordance with the applicable law in certain situations in order to avert

damage to themselves and FUCHS. To this end this Policy sets out standards for the cooperation with business partners, in particular concerning the permissibility of conferring advantages to business partners.

1.3 Subject matter of the regulation

This Policy is based on the laws applicable at the time of the issuance of this Policy and is not restricted to German law. The Policy applies globally and therefore also uses standards of conduct that are applicable in other jurisdictions (e. g., US Foreign Corruption Practices Act or UK Bribery Act).

If FUCHS Employees work in countries where, based on statutory regulations, the standards of conduct are stricter than those set forth in this Policy, these stricter standards shall take precedence over the provisions set out in this Policy.

The standards and principles set out in this Policy cannot cover every imaginable scenario that may be considered as problematic by the respective locally applicable laws. Hence, each Employee is obliged to use his/her own prudent judgment to decide whether a certain course of action is in breach of the rules of this Policy or any locally applicable law. If the question as to whether such a course of action may breach locally applicable anti-corruption laws, arises, it is up to the respective Employee to inform the competent Compliance Officer in advance of the matter.

2 What is corruption?

Corruption refers to the abuse of power by persons entrusted with it for their private use or advantage. Corruptive behavior may take many different forms, e.g., the prohibited conferring of advantages to employees of other companies within the context of contract negotiations, tendering processes or in connection with the acceptance of an expensive gift from a business partner.

2.1 Bribery

One form of corruption is bribery. Bribery refers to situations where a natural or legal entity engages in the direct or indirect promising, offering, giving, requesting, or receiving of inadmissible advantages in the private and state domain with the intention of achieving unfair preferential treatment. Advantages – of a financial or other nature – cover gifts, payments, and other advantages; they include, among other things, free or discounted FUCHS products, cash, shares, and other items equivalent to cash (gift certificates and vouchers), loans and daily allowances. To avoid the mere appearance of potential bribery, it is therefore forbidden to offer or accept cash or vouchers.

2.2 Bribery of public officials

Any dealings with public officials are subject to particularly strict rules. Public officials are persons holding public

office or who are otherwise entrusted with performing administrative tasks at another organization or in the name of such an organization irrespective of the organizational structure chosen for performing such tasks. The typical public officials are persons who work for governments, ministries, courts, (trans-)national, regional, and local administrative agencies or other government bodies such as, for example, civil servants or public-sector employees. They can, however, also include people working for private companies that are state-controlled and/or state-owned (e.g., state-owned mining companies or state-owned rail and transport companies). Generally, companies where the state, directly or indirectly, holds more than 50 percent of share are deemed to be state-controlled.

2.3 Bribery is a punishable offense

Corruptive behavior and bribery in particular are punishable offenses in most countries in the world. They lead to a custodial sentence and/or large fines. Both parties, i.e., the briber as well as the bribed, are liable to prosecution.

2.4 The mere offering or requesting is prohibited

Corruption starts long before unfair advantages are granted or accepted. The mere offering, promising, requesting, and accepting of promises lead to liability to prosecution and all associated consequences.

2.5 Corruption shall not be tolerated

FUCHS shall not tolerate corruption – neither by FUCHS Employees nor by business partners. Breaches of the respective applicable law and the provisions set forth in this Policy shall, depending on each individual case, lead to the consequences due under the (employment) law. FUCHS strictly forbids any participation in or toleration of any kind of corruption.

FUCHS expects its Employees to pursue the common goal of avoiding corruption in connection with their work for FUCHS, reporting potential misconduct to the competent Compliance Officer and, by doing so, strengthening the corporate culture and reputation of FUCHS. Based on the standards and values set out in the Code of Conduct, it is incumbent upon every Employee to avoid the mere appearance of corruption in all work-related activities.

3 Consequences for employees and company

Breaches of anti-corruption laws can have far-reaching legal consequences for FUCHS Employees and FUCHS itself. Furthermore, the reputation of FUCHS can suffer immense damage.

3.1 Consequences for the employee

Individual FUCHS Employees who breach the law may be faced with a custodial sentence, a fine or a financial penalty. In addition, there is the threat of sanctions under employment law such as (immediate) dismissal as well as civil liability for any loss/damage suffered. Members of the management team may even be prosecuted in cases where they breached their supervisory and organizational duties and, by doing so, failed to prevent or impede corruptive behavior. It is therefore the duty of all members of the respective management team to counteract corruptive behavior by creating an awareness of the applicable standards of conduct, performing regular checks, investigating suspicious cases, and sanctioning breaches accordingly.

3.2 Consequences for FUCHS

The potential consequences for FUCHS are dramatic. If anti-corruption laws are breached, the company faces large fine, disgorgements, so-called “blacklisting” (exclusion from public and private tenders) and may be liable under civil law towards third parties. Furthermore, the reputation of FUCHS may suffer immense damage – even if the initially instigated investigation procedures are later discontinued.

4 General standards of conduct for the prevention of corruption

The purpose of the following standards of conduct is to avoid the mere appearance of corruptive behavior:

4.1 Selecting business partners

Business partners must exclusively be chosen in accordance with the principles of fair competition, i. e., primarily based on price, quality, and the suitability of their services. Business partners as defined by this Policy are persons or companies as well as their executives, employees, and authorized representatives with whom FUCHS maintains, has maintained or may, in the future, maintain business relations.

Conflicts of interest must be avoided when it comes to selecting a business partner. A conflict of interest arises if the objective decision-making ability of the FUCHS Employees concerned is influenced by their own interests or by interests of third parties and their business decisions are no longer made exclusively for the benefit of FUCHS.

4.2 Accepting advantages

All FUCHS Employees must, from the outset, reject any attempt made by business partners to use dishonest means to influence the placement of an order by offering, promising, or conferring personal advantage. Any such attempts must immediately be reported to the respective competent Compliance Officer or the Group Compliance Office.

4.3 Conferring advantages

FUCHS maintains its market share exclusively through the high quality of its products and services, its customer friendliness, and an attractive price-quality ratio; this is what underpins all dealings with its business partners.

FUCHS Employees are forbidden from undertaking any attempt to use dishonest means to influence the decisions of business partners by offering, promising, or conferring personal advantage.

4.4 Advantages for persons with close ties to business partners

The prohibition of unfair advantages pursuant to section 4.3 above also applies to persons who are close to business partners. They include, among others, persons such as live-in partners/spouses and other immediate family members but also companies where such persons have a significant shareholding. The customary practice of acquiring minor shareholdings in listed companies for example is exempt. In cases of doubt, a person must be considered as someone close to a business partner if that person may be suspected of receiving an advantage on behalf of that business partner.

5 Gifts and hospitality

Appropriate presents and a reasonable level of hospitality are not uncommon in a national and international business setting and are frequently even part of the business culture. Many of the good and enduring business relationships of FUCHS are based on social interactions that may include the exchange of socially acceptable gifts of little value and mutual hospitality. The occasional conferring or accepting of appropriate gifts and hospitality in a business context is not per se illegal. What does matter is its compatibility with the respective applicable law and the company's mission statement set out in the principles listed below. Dealings with public officials are, as far as this matter is concerned, subject to particularly strict regulations.

Gifts as defined by this Policy are payments (including items equivalent to cash such as vouchers, and gift certificates), advantages, gratifications, or favors of a financial or other kind that are offered, assured, granted, or accepted without an appropriate, direct, or indirect, material, or immaterial consideration in return.

Hospitality as defined by this Policy covers all forms of pleasant social activities (e. g., meals), events (e. g., tickets for sports events), trips, hotel accommodation or other invitations. For the purpose of this Policy, presents and hospitality are jointly defined as "Advantages".

5.1 Social acceptability and principles

Gifts and hospitality are no longer socially acceptable if they exceed the limits of customary business practice, or the personal lifestyle of the persons involved. Any evaluation of social acceptability must, apart from the local requirements to be taken into account, particularly consider the hierarchical levels of the persons involved, the frequency of such gifts and hospitality as well as the respective occasion and particular type of event. The specific FUCHS rules concerning gifts and hospitality that need to be complied with are set out in the following paragraphs. The correct fiscal treatment of gifts and hospitality must, in every case, be ensured.

FUCHS Employees must, neither for themselves nor on behalf of third parties, ask business partners for gifts, invitations and hospitality, personal services or favors independently of their respective value.

FUCHS Employees and their immediate family members must not accept monetary gifts or items equivalent to cash (e. g., vouchers and gift certificates) offered by business partners irrespective of their value. In return, FUCHS Employees must neither offer, promise, or grant business partners or persons close to them any monetary gifts or items equivalent to cash.

5.2 Gifts, hospitality, and events in connection with public officials

5.2.1 Principles

FUCHS Employees are, on principle, prohibited from offering, promising, or granting public officials pursuant to section 2.2 hereunder gifts, hospitality and invitations to events even if they are of little value. As a rule, the offering and granting of any Advantages to public officials, irrespective of their value, is prohibited.

5.2.2 No advantages for persons with close ties to and employers of public officials

The prohibition of Advantages also applies to persons with close ties to the public officials mentioned in section 2.2 hereunder. Close ties are deemed to exist in particular in the case of

- persons such as live-in partners/spouses, immediate family members, friends, or persons who receive the Advantage on behalf of the public official; and/or
- companies where public officials or persons with close ties to them have a (direct or indirect) shareholding. The customary practice of acquiring minor shareholdings in listed companies is exempt.

The prohibition of Advantages also extends to the body employing the public official and/or the employer (e. g., state-controlled company) of the respective public official.

5.3 Gifts, hospitality, and events in a private business context

5.3.1 Principles

This Policy permits the occasional acceptance or the granting of appropriate gifts or hospitality in a commercial environment if they are socially acceptable and if there is a verifiable business connection. Gifts and hospitality may however be associated with corruption if they are offered or accepted with the intention of influencing business decisions in inadmissible ways or gaining an unfair advantage. Furthermore, the mere appearance that someone was intending to exercise undue influence or that undue influence may be possible must be always avoided. Therefore, it is essential to always refrain from offering gifts and hospitality at or around the time when business decisions/contract negotiations have recently been, are being or will be taken, which could give the impression of improper influence.

The occasional acceptance or granting of customary courtesy gifts of little value or hospitality as well as invitations to events and/or their acceptance is permitted to a reasonable extent, provided that the general criteria set out in section 5.1 hereunder, locally applicable laws and any internal policies are complied with. Business lunches/dinners are generally permitted if they are

compatible with the general criteria concerning social acceptability pursuant to section 5.1 hereunder, only take place occasionally and are appropriate for the persons taking part.

Cases of doubt must be approved and documented in advance by the superior and the competent Compliance Officer taking into account the general principles set out in this Policy. If, based on local jurisdiction, stricter rules apply, they must be adhered to. Irrespective of these cases, the offering, promising, and granting of gifts and hospitality is always forbidden if there are reasons to believe that the recipient is prohibited from accepting the Advantage or if one could gain the impression that ongoing business decisions or contract negotiations could be influenced.

5.3.2 Attending events that are business-related

An event is business-related if its content is connected to the work performed by the employee concerned or the business activities of FUCHS. Typical events are presentations on certain subjects, symposia, discussion panels, workshops etc. FUCHS Employees are permitted to attend business-related events the costs of which are borne by third parties if:

- there is a business connection and if, in the individual case, attendance is in the interest of FUCHS; and
- the host is present at the event; and
- the level of common business practice is not exceeded, and the principles set out in section 5.3.1 hereunder are complied with; and
- it is impossible for business decisions to be or appear affected by their attendance; and
- the invitation does not also include the live-in partners/spouses or immediate family members.

There may also be business-related reasons for attending representational events organized by business partners such as, for example, plant openings, anniversary celebrations or charity events. Furthermore, FUCHS Employees who, serving on certain committees, attend events as FUCHS representatives do so for business-related reasons.

Generally speaking, live-in partners/spouses or immediate family members of Employees are not allowed to accompany them to business-related events that are paid for by the host. Exceptional approval may be granted for invitations to events such as balls, charity galas or other social functions of a representational character if taking part is unproblematic and being accompanied is common social practice. This applies in particular to cases where taking part in the event is about representing FUCHS in an appropriate and socially acceptable way.

5.3.3 Attending events that are not business-related

Taking part in events whose purpose is exclusively or predominantly social and of a recreational nature (cultural, sports-related, etc.) is only permitted after prior documented approval by the superior and the competent Compliance Officer has been given, if the cost of attending such events does not generally exceed a certain socially acceptable level and as long as the other criteria set forth in sections 5.3.1 and 5.3.2 hereunder are complied with.

5.3.4 Invitations by FUCHS

Invitations of business partners and other persons by FUCHS to *business-related* events are permitted if such invitations comply with the socially acceptable rules pursuant to sections 5.3.1 and 5.3.2 hereunder and do not generally exceed the level of common business practice.

Invitations of business partners and other persons by FUCHS to events that *are not business-related* but whose purpose is exclusively or predominantly social (cultural, sports-related, etc.) are only permitted in exceptional, justified cases (e.g., events where FUCHS, in accordance

with section 7 hereunder, acts as the sponsor) and only after prior documented approval by the superior and the competent Compliance Officer.

Generally, live-in partners/spouses or the immediate family members of business partners should not be invited to events by FUCHS. Exceptional approvals may be granted for invitations to events such as balls, charity galas or other social functions if taking part is unproblematic and being accompanied is common social practice and appropriate.

The invitation must always be in accordance with the rules of the business partner and be offered in a transparent fashion. Any invitation must, in advance, be checked with the business partner for conformity with the compliance rules of the business partner and be properly documented.

5.3.5 How to proceed in cases of doubt

In all cases of doubt, irrespective of the type and level of the Advantage, the prior documented approval by the competent superior and the competent Compliance Officer must be obtained.

6 Commissioning intermediaries, consultants, and service providers

6.1 Principles of commissioning

FUCHS needs and appreciates the collaboration with its intermediaries, consultants, and service providers. At the same time, their commissioning also entails risks. One must also consider that the commissioning of third parties could be used as a means of concealing corruption or that misconduct by such third parties may be attributed to FUCHS.

Typical intermediaries are, among others, brokers, sales representatives, and agents. Intermediaries, consultants, and service providers shall be jointly referred to as "Consultant/s" below.

Fees for Consultants may be suspected of being used to conceal corruptive Advantages and to influence decision makers on the client side or public officials. To do business with reliable Consultants and prevent the mere appearance of corruptive behavior, it is important to pay attention, at regular intervals, to the following points concerning the involvement of Consultants and ongoing business relationships:

- The professionalism of the Consultant must be checked (section 6.2);
- the appropriateness of the consideration must be looked at (section 6.3); and
- the type of work must be documented (section 6.4).

6.2 Professionalism of the consultant

To be assured of the professionalism of Consultants, it is particularly important to establish their reputation, creditworthiness as well as presentation in the marketplace. This means that, among other things, the Consultant's references, public presentation as well as compliance with regulatory or market requirements for performing the respective activity must be looked at. It is essential to avoid conflicts of interest when it comes to choosing Consultants. The mere appearance that Consultants may have been chosen due their proximity (see sections 4.4 and 5.2.2 hereunder) to a customer or public official (see section 2.2 hereunder) must be avoided.

6.3 Appropriateness of the consideration

Any fees paid to the Consultant must always be checked for appropriateness and market conformity. Among other aspects, criteria such as the respective industry, region and type and extent of the service may be used.

6.4 Documentation

A precise description of the type and scope of the services owed by the Consultant must be included in a contract that must always be drawn up in writing. The respective FUCHS Employee must document the services received or rendered for the purpose of proof (e. g., by means of meeting minutes, activity reports or other proof of performance) and provide the Consultant with confirmation

upon payment of the service. It is furthermore essential to ensure that the service provider and the recipient of the payment are identical. Payments where the service provider and the recipient of the payment are not the same must not be undertaken without consultation with the competent Compliance Officer.

7 Donations, sponsoring, and memberships

FUCHS is aware of its social responsibility and meets its duties by making donations and providing sponsoring.

7.1 Donations

Donations are Advantages that are provided voluntarily in the form of money, services, benefits in kind or financial advantages without being entitled to a consideration in return.

Donations are only made to charitable organizations and associations that pursue charitable, cultural, ecological, scientific, and sports-related goals. It is important to ensure that the various organizations and associations benefit equally.

7.2 Sponsoring

Sponsoring is a tool of communication and as such part of the communication strategy of FUCHS. Sponsoring as defined in this Policy means the provision of money, services, or benefits in kind with the sponsor expecting something such as publicity for FUCHS in return.

Sponsoring to pursue sports-related, cultural, social, environmental, and scientific goals is permitted. In return for sponsoring, the communication and marketing goals of FUCHS must be supported. This may involve things such as branded football shirts, perimeter advertising, advertising hoardings, ticket allocations or the mentioning of FUCHS on flyers, programs or on tickets. Sponsoring services must always be agreed in writing.

7.3 Admissibility and approval

Making donations to and sponsoring political parties and organizations as well as their representatives is forbidden.

The offering and providing of donations and sponsoring may only be permitted if the possibility of influencing business or regulatory decisions by doing so can be excluded. Neither must such actions give rise to the impression that the influencing of decision makers is intended or possible.

The offering and the providing of donations and sponsoring irrespective of the type and extent and independently of the respective recipient must be coordinated with the competent marketing department of FUCHS, which, in cases of doubt, must consult the competent Compliance Officer. The correct fiscal treatment of donations and sponsoring must, in every case, be ensured.

7.4 Memberships

Paid memberships in associations, clubs or other organizations must be authorized and documented by the respective superior in consultation with the competent Compliance Officer. This applies both to memberships of FUCHS and memberships of FUCHS Employees the costs of which are borne by FUCHS.

Legally mandatory memberships or voluntary, company-initiated memberships in industry/trade or professional associations are permitted.

8 Group Compliance Office, reporting suspicious cases and whistleblower system

8.1 Group Compliance Office

As shown by this Policy, corruption is an extraordinarily complex issue. To answer questions concerning the use of this Policy, cases of doubt and the lawfulness of certain types of conduct, FUCHS has set up a Group Compliance Office that acts as a central port of call for all Employees. You may contact that Office as well as the respective competent Compliance Officer if you have questions, want to make comments and observations concerning corruption-relevant issues. The Group Compliance Office may be contacted as follows:

FUCHS Group Compliance Office

E-mail: compliance@fuchs.com

8.2 Reporting suspicious cases

If FUCHS Employees were to suspect that a certain type of behavior may breach this Policy or other group policies, the Code of Conduct, or the law, they must immediately contact their respective superior, the competent Compliance Officer, the central Group Compliance Office, or the FUCHS unit in charge.

8.3 Whistleblower system

Potential breaches of the law and/or compliance rules may also be reported online via our internet-based whistleblower system called "FUCHS Compliance Communication." The portal is based on a standardized system solution and meets the highest IT security standards. The FUCHS Compliance Communication helps FUCHS Employees to submit detailed observations of breaches or suspicious cases and enter into a dialog with the competent unit. Users of the FUCHS Compliance Communication System can remain anonymous during the entire process if they so wish. The portal can be accessed at → www.bkms-system.net/FUCHS-Compliance-Communication.

8.4 How to manage reports

FUCHS Employees who, acting in good faith, report potential breaches of this Policy or another group policies, the Code of Conduct or the law must not be exposed to retaliatory measures. FUCHS appreciates openness. We support anyone who, acting in good faith, reports concerns. This also applies if, later, these concerns turn

out to have been unjustified. If FUCHS Employees feel that due to submitting their report in accordance with this Policy, they are subject to adverse treatment, we are asking them to contact the Group Compliance Office or the competent Compliance Officer. FUCHS is going to confirm receipt of the report within seven days and inform the whistleblower within three months of how the report has been managed and what measures have been undertaken. This does, however, not mean that a possible investigation needs to be completed within three months.

Imprint

Imprint

Publisher

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