



LuerChem Code of Conduct

This Code of Conduct has been developed primarily from the UN Global Compact's Ten Principles (www.unglobalcompact.org), which is derived from the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Convention Against Corruption.

LuerChem is committed to operating in a responsible manner, complying with all relevant local, national, and international laws, thereby ensuring we provide our Principals with first class customer contact, services, and know-how in an ethical and transparent manner. LuerChem recognizes its employees represent the company, and as such requires its employees to adhere to the Code of Conduct and encourage those companies it does business with to commit to similar principles.

1) Human Rights and Labour:

Respect of Human Rights and Work Environment:

We provide a safe, professional, respectful, and non-discriminatory working environment, in compliance with labour laws. We respect the human rights and dignity of our employees and all those we do business with.

We respect what everyone brings to our team, including background, education, gender, race, ethnicity, working and thinking styles, sexual orientation, gender identity and/or expression, religious background, age, generation, disability, and cultural expertise. We believe our ability to meet the needs and expectations of an increasingly diverse and global industry is tied closely to diversity and inclusiveness, in conjunction with a positive and enjoyable working environment. Employees are recruited and selected in a fair and transparent manner, and we abide by local employment laws and practices, providing fair salary payments and benefits that exceed the minimum standards required by local laws and regulations.

2) Compliance and Integrity:

Anti-Bribery/Anti-Corruption/Anti-Trust:

We will comply with both the spirit and the letter of competition laws and are committed to doing business fairly. We operate a strict policy to ensure that our activities are in full compliance with anti-bribery laws, all applicable anti-trust (competition) laws and the LuerChem Anti-bribery & Corruption Policy.

Acting as an Agent, Interaction with Third Parties and Trade Control:

We operate as an Agent for several Principals and do so in compliance with our own Code of Conduct and those of our Principals.

We will not make any form of facilitation payments (fees requested by Government officials to facilitate routine activities) and will not make political donations.

We will operate in accordance with applicable international trade compliance and sanction laws.



Money Laundering:

We will not enter into, nor tolerate any arrangement which appears to, or which is suspected to be used to facilitate any acquisition, retention, use, or control of any property or money intended to disguise the proceeds of a crime.

Gifts and Entertainment:

While accepting or providing gifts, entertainment, and hospitality can strengthen business relationships, it can also create conflicts of interest. We will ensure that gifts are legal, appropriate, and reasonable. We never accept or provide anything of value (a "gift") that may create a conflict of interest or suggest something improper.

Conflicts of Interest:

We will always act in the best interest of our company, our Principals and our customers. We avoid conflicts of interest and never use our position or company assets for personal gain.

3) Environment, Safety and Social Responsibility:

We expect our Principals and customers to comply with all applicable environmental law and regulations, ensuring all required licenses, permits, registrations are obtained and adhered to and to conduct operations in an environmentally responsible manner to mitigate adverse effects on the environment. We also expect our suppliers take reasonable precautions to avoid the use of conflict minerals in the manufacture of chemicals supplied to us.

4) Governance:

Our employees will receive the appropriate training to ensure their competency in relation to the commitments laid out in this Code of Conduct. The level of training will vary depending on the role and department, but all employees will be aware of and commit to this Code of Conduct which will form part of their employment contract, and subsequently any violation of the principles behind these commitments may lead to disciplinary action. Employees are encouraged to raise any concerns they have in relation to non-compliance with these commitments, and any information provided by employees will be held in confidence to the extent permitted by law.