

CODE *connect*

Diersch & Schröder Group

ENERGY

DS // WESER-PETROL

DS // MINERALÖL

DS // CARD+DRIVE

CARD+DRIVE
Polska

LANFER
ENERGIE

E M O V A
Energie. So einfach.

UTG
Unabhängige Tanklogistik GmbH

ENERGU

HAUER

WESER
TANKING

LEU.

CHEMICALS

ADDITIV
CHEMIE
LUERS

ESTICHEM^{AS}

ACF

LEVACO
CHEMICALS

Sparks

YOUNG BUSINESS

SCS

ELAPRO

ecopox

polytives

Lynatox



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FOREWORD

Dear Readers,

We at Diersch & Schröder GmbH & Co. KG and its affiliated companies (hereinafter: "DS Group"), are aware of our responsibility towards our employees, their families, our shareholders, our business partners and the social environment. In this respect, we would like to give our assurance that we will always conduct our business reliably with a focus on performance and sustainability.

The following principles define our mission statement:

RELIABILITY, FAIRNESS AND RESPECT

"Business is done between people"

This expresses the special appreciation we have for our business partners and the fair and respectful way in which we treat each other.

OUR FOCUS ON PERFORMANCE

"Better together"

As a business company, we want to be and must be profitable in order to be sustainable and to remain independent. We set ourselves ambitious goals and realize them together.

SUSTAINABILITY

"Thinking in terms of generations – for over 100 years already"

For us, sustainability means corporate management with a long-term focus. This includes the careful use of resources and the environment, as well as the assumption of social responsibility. We see change and transformation both as an opportunity and as a necessity for the long-term success of our Group.

DS Group can realize this mission statement only if we work together responsibly.

We do not accept any unlawful or inappropriate behavior in conflict with this Code of Conduct.

Bremen, September 1, 2023



Jan Christiansen



**With great
power comes great
responsibility**



Jan Christiansen

Chief Executive Officer
of the Diersch & Schröder Group

Code of Conduct

1 Lawful conduct

Lawful action is the fundamental prerequisite for any activity in the interests of the DS Group. We comply with all laws and regulations that are applicable to us as well as with the current internal policies of the DS Group.

Even in areas where legislation does not provide sufficient guidance, we must act in the same way we expect others to behave. Our ethical and moral compass provides the explicit benchmark for our conduct.

2 Respect and non-discrimination

We respect the personal dignity, privacy and personal rights of each individual. We work with people of different ethnic backgrounds, cultures, religions and ages, regardless of disability, skin color, sexual orientation, beliefs or gender.

We do not tolerate any discrimination based on these characteristics or any other personal attacks on individuals or groups of individuals. For us, friendly, respectful and fair treatment of colleagues and business partners is a matter of course.

3 Corporate responsibility and sustainable management

The long-term existence of the DS Group has priority over short-term profit maximization. Our innovative capability ensures our competitiveness and the establishment and expansion of sustainable business models.

Our goal is to create a safe, healthy and long-term working environment for our employees that promotes creativity and free thought.

Economic success is possible in the long term only if it goes hand in hand with social and ecological responsibility. We are working on our Sustainability Program across all business areas and disciplines.

3.1 Our work culture

Our work culture is based on trust, respect and appreciation. The DS Group creates framework conditions that support employees in their respective individual life situations. In addition to fair pay, this includes flexible working time models, a healthy work-life balance and a wide range of additional benefits.

Through personal and professional advancement, we support committed people who bring in their own ideas and contribute their enthusiasm and skills to DS Group. With a multifaceted work environment and diverse teams, we promote openness and a wealth of perspectives.

3.2 Our management culture

Our managers are responsible for their employees. They develop the skills of their employees and promote independent thought and action. They provide orientation and security through exemplary behavior and clear, realistic goals. They create a basis of trust characterized by honest, appreciative communication.

By dealing openly with mistakes and through mindful and constructive criticism, we aim to support the positive development of employees.

Every manager has organizational and supervisory duties to perform. Managers must ensure that any infringements of the law are prevented through appropriate information and suitable organizational measures.



3.3 Occupational health and safety

Our employees and their health and well-being are our most valuable assets.

We ensure health and safety at our production sites, service stations and tank depots by maintaining the highest safety levels and providing regular training for our highly qualified specialist staff. As part of our corporate health management, we provide a wide range of offers and opportunities to promote the health of our employees, both at work and in their free time.

3.4 Cooperation with employee representatives

We respect the right of freedom of association and collective bargaining. Our cooperation with all members of the workforce, with employee representatives and with trade unions is based on trust and respect. In this way, we always strive for a fair balance between the economic interests of the DS Group and the interests of our employees.

3.5 Respect for human rights

The DS Group respects human rights at every location, both internally and within our external sphere of influence. We are committed to respecting and promoting human rights. Our position on human rights is clear and unwavering, in particular regarding to our strict rejection of child and forced labor.

This also applies to our supply chain. For more information, we refer to our "Statement of Principles on the Protection of Human Rights and the Environment." Our Whistleblower System is available at www.ds-bremen.com/en/whistleblowing-process (see also page 16).

3.6 Social commitment

In addition to our own business activities, it is a matter of course for us to support the social commitment of a wide variety of institutions. In doing so, we neither pursue an economic self-interest nor do we demand or expect any consideration in return.

3.7 Environmental management

We are aware of the impact of our products during production, transport, combustion and use, and we use our sphere of influence, including in the value chain, to keep this impact to a minimum.

As part of our climate and environmental management, we are constantly working to improve our environmental performance through climate and environmental protection measures and responsible resource management.

4 Integrity and conflicts of interest

The DS Group is committed to integrity and transparency. Decisions are based on comprehensible and justifiable criteria (e.g., price, quality, reliability, etc.) and must not be guided by private interests nor by family or personal relationships.

We make decisions regarding our employees and applicants based on criteria such as competence, performance and conduct in the workplace.



5 Anti-corruption

5.1 Dealing with business partners

We earn the support of our business partners through our products and services and not by exerting undue influence. Likewise, we make decisions for objective and comprehensible reasons and do not allow ourselves to be unduly influenced.

5.2 Dealing with authorities

In our dealings with staff at public authorities and public enterprises, as well as with public officials and politicians, we act with integrity and transparency and avoid even the appearance of undue influence.

5.3 Gifts and invitations

Cooperation with business partners should be based on objective and comprehensible reasons and not be influenced by inappropriate gratuities. Smaller gratuities (gifts, invitations, gestures of politeness) are acceptable if they do not exceed a reasonable limit and do not affect the decision of the business partners.

Voluntary promotional and occasional gifts of a merely nominal value may be accepted. Meals or entertainment offered by business partners may only be accepted if they are unsolicited, serve a business purpose, are not repeated with undue frequency and if the invitation is in proportion to the occasion.

Benefits that exceed the usual level or where it is uncertain whether they are appropriate must be evaluated in consultation with the line manager and the Compliance Officer.



6 Competition

The DS Group is committed to fair competition. We do not collude with competitors to fix prices or terms of sale, to allocate markets or to limit production. We neither share nor discuss confidential information with competitors.

7 IT security and data protection

7.1 IT security

Access to the Internet as well as the global electronic exchange of information are crucial prerequisites for the successful conduct of our business activities.

The advantages of electronic communication are associated with risks relating to the protection of privacy and the security of data. To minimize these risks, the greatest possible care must be taken in any use of these communication methods.

We therefore apply all available, suitable and reasonable technical and organizational measures to protect corporate information against unauthorized access, unauthorized or improper use, loss or premature destruction. For further regulations relating to the IT systems of the DS Group, we refer to our IT Governance.

7.2 Data protection

We respect the high degree of sensitivity of the data entrusted to us by our business partners and employees and protect it by handling it with care and trust.

We only collect and process personal data with the consent of the data subject where this is necessary to protect our legitimate interest or to fulfill a contractual obligation, or if, for other reasons, legal regulations require this. In addition, we collect, process and use personal data only to the extent necessary and only for the intended purposes. For further regulations on the subject of data protection, we refer to our Privacy Policy.



Intellectual property

The goodwill of the DS Group is based on the ideas and the creative power of people who are as committed to the future success of the DS Group today as they have been in the past. We protect intellectual property created by us (e.g., patents, recipes, IT solutions, etc.), our reputation and our brands against loss, theft and misuse.

Trade secrets and our intellectual property may not be disclosed to third parties or published without legal protection. Employees may not use the intellectual property of the DS Group for their own purposes.

We take great care not to use or copy the proprietary rights or confidential information of others unless we have permission or another right to do so.



Tax and customs

We comply with the provisions of tax and customs law. A correct and timely declaration of the taxes and customs duties to be paid is a matter of course for the DS Group.



Export controll and economic sanctions

We have established internal processes and control systems to prevent the misappropriation of our products or use of our services.

We also do not conduct business with individuals, companies or organizations that are associated with nuclear, chemical or biological weapons, terrorism or drug trafficking, or with any other prohibited activities. We furthermore adhere to restrictions on payment and other financial transactions with sanctioned individuals, companies, or organizations.

11 Proper accounting and reporting

The DS Group records its business activities and financial transactions completely and accurately to provide a true and fair view of its net assets, financial position and results of operations.

We comply with relevant financial reporting and accounting standards and principles as well as with tax laws and regulations. Our internal control system is designed to ensure that all business events and transactions are recorded completely and correctly.

12 Publications and social media

The DS Group uses various media to report to its stakeholders and other interested parties and to share information.

The following applies: We are independent, non-political and non-partisan. As an international company, we stand for tolerance and respect. We do not tolerate inflammatory, insulting or discriminatory posts that discredit our reputation or that of our employees. When discussing work-related topics in the context of our private activities on social media, we must make it clear that we are reflecting our own personal opinions and not those of the DS Group.



13 Sponsoring and political organizations

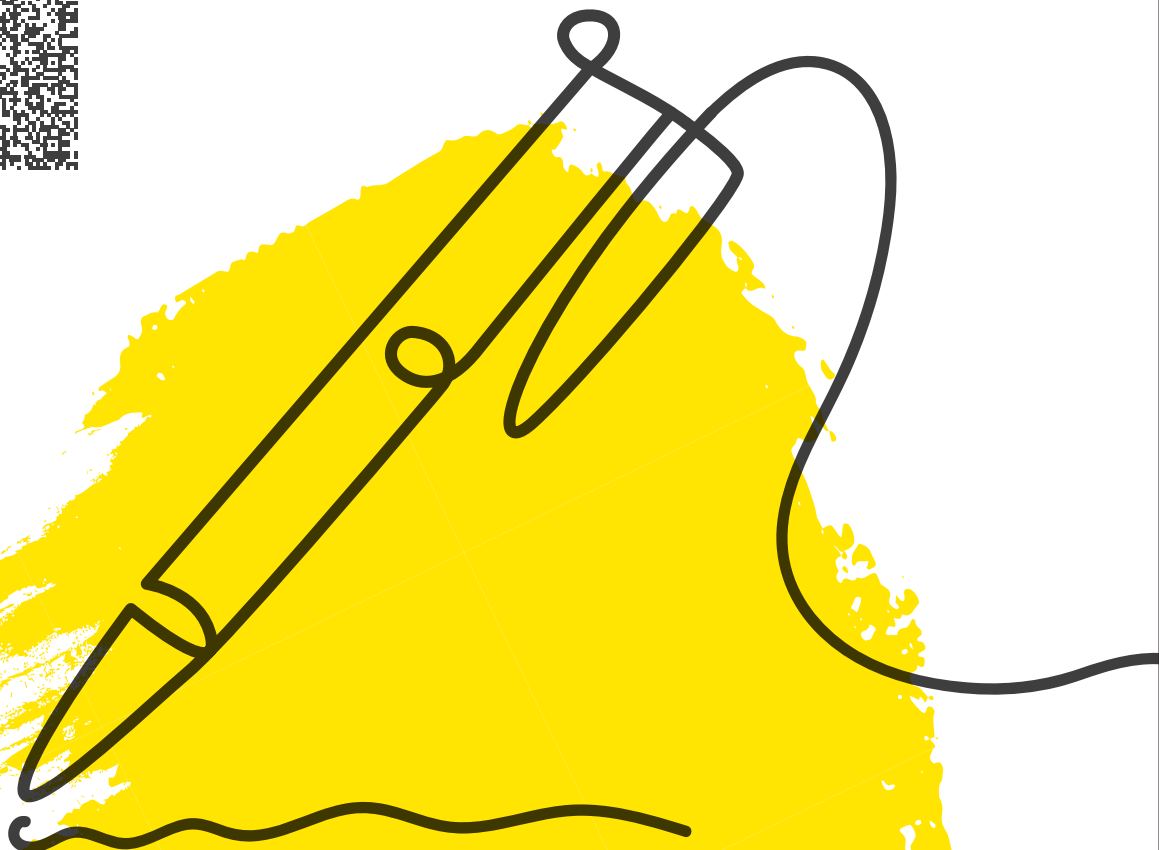
We use sponsoring to a limited extent to positively shape our reputation and the public perception of our company. We do not make political contributions or donations to political parties.

Important Information

This Code of Conduct cannot provide concrete answers every question and situation. If further information is required, the Compliance Officer can be contacted at **compliance@ds-bremen.de** at any time.

Publisher:

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Corporate Compliance
Cuxhavener Straße 42/44 | 28217 Bremen
compliance@ds-bremen.de



Dealing with infringements of rules

1 Detecting and reporting infringement

Infringements of laws, regulations and guidelines may lead to economic losses, damage to image and reputation, or risks of criminal prosecution and fines. Likewise, there is the risk that permits will not be issued as well as the risk of being excluded from competition. Infringements must be prevented as far as possible, or at least detected in a timely manner, to prevent damage to the DS Group or to its employees. If we observe an infringement of rules or if we have reason to believe that there has been an infringement, we do not hesitate to address it openly.

2 Whistleblower System

Our Whistleblower System (www.ds-bremen.com/en/whistleblowing-process) is available to all employees, business partners and third parties to report infringements. Our Whistleblower System supports the entire process, from the whistleblower reporting an infringement to the conclusion of the process. The Whistleblower System ensures the highest level of confidentiality and – upon request – anonymity. We attach importance to fairness in dealing with all parties involved in the respective process. The principle of proportionality is observed at all times, and for each individual case, we examine which consequences are suitable, necessary and reasonable.

Reports may also be submitted to compliance@ds-bremen.de. The principles of confidentiality, fairness and proportionality outlined above also apply here.



TEAMWORK

VALUES

sustainability

RESPONSIBLE

TRANSPARENCY

INTEGRITY

INCLUSI

human rights

TRUST development

IN

environment
SECURITY HEALTH
 APPRECIATION
SIBILITY SOCIETY
 fairness
TOLERANCE
 ON ethics **RESPECT**
 data protection performance orientation
NOVATION **LAW**

ENERGY

Better together for **mobility, heat**
and electricity – that's what drives us.

CHEMICALS

Our **additives** lubricate industrial production
equipment and protect banana plants.

YOUNG BUSINESS

Start-ups help the DS Group to stay **young** and **innovative**.