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WE MAKE
CHEMISTRY
WORK

CODE OF CONDUCT MAVRO INTERNATIONAL

Business ethics, integrity and responsible business practices

Mavro BV (trading as Mavro International)
Version: 1.0
Date: 30 September 2025
Document owner: HR Manager

Applies to: All employees, managers and directors of Mavro International and affiliated companies to which this Code of Conduct has formally been declared applicable.

1. Purpose of the Code of Conduct

Mavro International is committed to conducting business honestly, safely, respectfully and in a socially responsible manner.

We believe it is important that employees, customers, suppliers and other stakeholders can place their trust in our organisation.

This Code of Conduct describes the principles we apply in our day-to-day work, business relationships and decision-making.

Everyone acting on behalf of Mavro International is responsible for complying with these principles.

This Code of Conduct supplements our employment contracts, internal regulations, JEDI policy, complaints procedure, safety instructions and other applicable internal policies. Where legislation imposes stricter requirements, we comply with the law.

2. Compliance with laws and internal rules

Mavro International complies with applicable laws and regulations.

We expect employees to:

1. Carry out their duties in accordance with applicable legal requirements.
2. Follow internal procedures and work instructions.
3. Act honestly and with due care.
4. Report potential violations or irregularities.
5. Seek advice before making a decision when in doubt.

No employee may be required to knowingly violate the law or applicable safety regulations.

3. Human rights and fair working conditions

Mavro International respects the fundamental rights of employees.

We do not tolerate child labour, forced labour, human trafficking or any other form of exploitation.

All work is performed voluntarily and within the applicable legal framework.

We respect employees' rights to:

1. A clear employment contract and transparent terms and conditions of employment.
2. Accurate and timely payment of wages due.
3. Working hours, rest periods and leave in accordance with the law.
4. Freedom of association and collective representation of interests.
5. A safe and healthy working environment.
6. Respectful treatment and protection from inappropriate behaviour.

Personal documents are not withheld as a means of coercion.

We do not tolerate unlawful financial penalties or other measures that conflict with applicable legislation.

4. Equal treatment and respectful cooperation

At Mavro International, we treat one another with respect.

We do not tolerate discrimination, intimidation, bullying, sexual harassment, threats or other forms of inappropriate behaviour.

Decisions concerning recruitment, selection, development, performance assessment, remuneration and other personnel matters are based on relevant and objective criteria.

Every employee should feel free to raise concerns or report inappropriate behaviour.

The JEDI policy and internal complaints procedure provide further details on these principles.

5. Health and safety

Mavro International is committed to providing safe and healthy working conditions.

This is particularly important because our activities involve machinery, production processes and chemical products.

We expect employees to:

1. Follow applicable safety regulations.
2. Use the prescribed personal protective equipment.
3. Only use machinery and work equipment when they have received sufficient instruction and are authorised to do so.
4. Handle hazardous substances with care.
5. Report unsafe situations, incidents and near misses.
6. Participate in safety instructions and necessary training.

Managers and those with functional responsibilities monitor compliance with safety regulations within their areas of responsibility.

Commercial interests or production pressure do not justify unsafe working practices.

6. Integrity and fair business practices

We conduct business honestly, transparently and professionally. We provide accurate information to customers, suppliers, regulators and other stakeholders.

We do not tolerate fraud, bribery, corruption, deception or improper preferential treatment.

Employees must not use their position or authority to improperly benefit themselves or others.

Business decisions are made in the interests of the organisation and on the basis of objective considerations.

7. Conflicts of interest

Employees must avoid situations in which personal interests could affect their independence in business matters.

Potential conflicts of interest may arise, for example, when:

1. An employee has a financial interest in a supplier.
2. A family member or personal contact is involved in a business decision.
3. An employee uses business information for personal gain.
4. Personal interests could influence the selection of customers, suppliers or employees.

Potential conflicts of interest must be reported to the management board in advance.

The management board determines which measures are necessary to ensure objective decision-making.

8. Gifts and business invitations

Business gifts and invitations must never result in improper influence.

Employees must not accept or offer gifts, payments or personal benefits where doing so could compromise the independence of a business decision.

In cases of doubt, prior approval must be obtained from the management board.

Bribery, kickbacks and other improper benefits are prohibited.

9. Confidentiality and protection of personal data

Mavro International handles confidential business information and personal data with care.

Employees may use confidential information only when necessary and authorised for their work.

We expect employees to:

1. Handle personal data with care.
2. Not share confidential information without authorisation.
3. Store business information securely.
4. Comply with applicable privacy rules.
5. Report potential data breaches or unauthorised disclosures.

These obligations also continue after employment ends, insofar as they arise from legislation or valid agreements.

10. Accurate records and reporting

We expect all business and administrative records to be accurate, complete and verifiable.

This includes, among other things:

1. Financial records and payments.
2. Working hours and overtime.
3. Production records.
4. Quality records.
5. Safety documentation.
6. Environmental records.
7. Audit documentation.

Deliberately falsifying, withholding or manipulating records is prohibited.

Errors must be reported, investigated and corrected in accordance with applicable procedures.

11. Environment and responsible use of resources

Mavro International is committed to responsible environmental practices.

We consider the environmental impact of our activities and comply with applicable environmental legislation.

We expect employees to:

1. Use energy, water and raw materials responsibly.
2. Separate and dispose of waste in accordance with applicable regulations.
3. Store and use hazardous substances safely.
4. Report environmental risks and incidents.
5. Cooperate with measures to reduce waste and environmental impact.

12. Fair business relationships

We treat customers, suppliers and other business partners professionally and respectfully.

We expect business agreements to be entered into honestly and with due care.

We do not knowingly provide misleading information about our products, services, quality or certifications.

We aim to work with business partners who respect applicable laws and conduct business responsibly.

13. Reporting complaints and misconduct

Every employee must be able to report concerns, complaints and suspected misconduct.

This may include, for example:

1. Discrimination or inappropriate behaviour.
2. Fraud, bribery or conflicts of interest.
3. Unsafe working conditions.
4. Breaches of privacy or confidentiality.
5. Inaccurate administrative records.
6. Other potential violations of legislation or this Code of Conduct.

Employees may use the complaints procedure applicable within Mavro International and the reporting channels described therein.

If a report concerns someone who would normally be responsible for handling it, the person making the report must be able to use another available and independent reporting channel.

Reports are handled carefully, objectively and as confidentially as possible.

Employees who report concerns in good faith must not suffer any disadvantage as a result.

Reports covered by statutory whistleblower protection are subject to the applicable legal rights and procedures.

14. Responsibility and leading by example

Every employee is responsible for their own conduct and for complying with this Code of Conduct.

We additionally expect directors, managers and employees with independent responsibilities to:

1. Lead by example.
2. Inform employees about relevant standards of conduct.
3. Recognise ethical risks and raise them for discussion.
4. Take reports and warning signs seriously.
5. Make careful and objective decisions.
6. Seek advice promptly when in doubt.
7. Participate in training and improvement measures.

A formal management role is not required to bear responsibility for acting with integrity.

15. Dealing with ethical dilemmas

When an employee is uncertain about a decision, the following questions should be considered:

1. Is my decision legally permitted?
2. Is my decision consistent with internal rules?
3. Is my decision fair and considerate towards those involved?
4. Are personal interests involved?
5. Can I explain my decision professionally and transparently?

6. Should I consult HR, the management board or another responsible person in advance?

If doubts remain, advice should be sought before making the decision.

16. Compliance and possible consequences

Mavro International expects employees to comply with this Code of Conduct.

Potential violations are investigated carefully. Those involved are given the opportunity to present their views.

If a violation is established, the organisation may take appropriate measures within the limits of applicable legislation, employment contracts and internal procedures.

The nature and severity of the violation and the circumstances of the case will be taken into account.

17. Communication and implementation

Following approval by the management board, this Code of Conduct will be made available to all employees to whom it applies.

Employees will be informed about its contents and the available ways to discuss questions, concerns and misconduct.

Additional training may be organised for employees with particular responsibilities.

HR and the management board oversee communication and periodic review of this Code of Conduct.

18. Adoption

This Code of Conduct was adopted by the HR Manager of Mavro BV (trading as Mavro International).

Date of adoption: 30 September 2025

Name: Marjon van der Lee

Position: HR Manager

Signature:

