

# THE DOMO CODE OF CONDUCT

An ethical and legal  
framework for all employees  
in the conduct  
of DOMO business



*“We want DOMO to be a place where our customers enjoy doing business and stay with us and a place where people like to work”*



Dear all,

Our inquisitive mind, curious attitude and caring spirit are balanced by a compliance culture with a strong focus on respect and high Health, Safety and Environment (HSE) standards. Everyone in DOMO Chemicals has an accountability for the ethical and safe operation in our business. Not least for this reason, has this been anchored by our four corporate values:

### ***Curiosity, Care, Respect and Accountability.***

Our vision is to make a positive contribution to society by creating value for all of our stakeholders. Our mission, **#caring is our formula**, is to engineer polyamide solutions that contribute to changing the world, sustainably and for the better. Our values, vision and mission make the DOMO story, which ultimately guides us in achieving our ambitions and goals. The DOMO story shapes our identity and makes our DOMO brand strong and unique.

As a global organization, we take our DOMO story, and the responsibility that comes with it, very seriously: we strive for transparency, diversity and integrity. We strive to be compliant at all times, following legal and external requirements of the countries in which we operate. Compliance makes good business sense. This is why we defined procedures and processes to support our compliance culture, and have guidelines, consultations and appropriate communication channels in place to discuss them when situations fail to meet our high standards.

The DOMO Chemicals Code of Conduct embodies our standards, principles and behaviors that are fundamental to the successful and ethical operation of our company. It's a clear, practical document that we're releasing as our internal and external directional compass. The Code of Conduct is the foundation for the relationships we nurture with colleagues, business partners, local communities and society at large. Its guidelines form the backbone of our individual and organizational behavior and the decisions we take.

Our Code of Conduct applies to everyone: to me, to our Executive Committee, to our leadership team, to our employees and to anybody directly or indirectly partnering with our organization. We set ourselves the highest standards of customer focus, innovation, cross-functional cooperation and performance, all matched by equally high standards of professional and ethical behavior. Regardless of our individual roles, levels of hierarchy or geography within DOMO Chemicals, we all share the responsibility to live up to these standards. They are non-negotiable, and we won't compromise on them - ever. They form our license to operate.

Take the time to read through the document. Pass it on and discuss it with others. Internalizing our Code of Conduct creates an integer environment all around, makes best use of everybody's time and talents, builds mutual trust and strengthens our reputation as an industry leader in sustainable practices.

Thank you for living up to this pledge.

Regards,  
Yves Bonte

# THE DOMO CODE OF CONDUCT



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*Our belief in people and teamwork requires cooperation with our colleagues across the DOMO Group to achieve our corporate goals.*

*Our words and actions must show respect for the diverse range of people and cultures with whom we work and for their human rights.*

## **1. HOW WILL OUR CODE OF CONDUCT HELP EACH OF US?**

This Code of Conduct provides an ethical and legal framework for all employees in the conduct of DOMO business. It is about how we relate to our customers, employees, shareholders, suppliers and the community. Its core purpose is to build and maintain trust between DOMO and other parties.

In this Code of Conduct the terms “we”, “our”, “us” and “DOMO” refer to DOMO Chemicals Holding NV and its affiliated companies.

We want DOMO to be a place where our customers enjoy doing business and stay with us and a place where people like to work. We want the trust of our shareholder to support investments. We want to be respected and welcome in the communities where we do business.

These results can only be achieved by adhering to common ground rules. Everyone who works for DOMO must be part of this.

## 2. IMPLEMENTATION

This Code of Conduct provides a common behavioural framework for all DOMO employees, irrespective of their specific job, direct employer or location in the world. Together with our Mission, Vision and Values it is a key part of the DOMO culture.

The Code is not intended to be all-encompassing. There are areas in which we expect our businesses to develop detailed policies in accordance with local requirements. The Code provides a set of guiding principles to incorporate with whatever additional local policies are required for your businesses.

## 3. CORPORATE SOCIAL RESPONSIBILITY

Many of the areas covered in this Code come under the broad heading of Corporate Social Responsibility (CSR) which describes how we interact with our stakeholders.

DOMO has adopted an overall CSR policy which can be found in **Schedule 1**.

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## 4. BUSINESS INTEGRITY

### 4.1 General Principles

All business should be conducted in accordance with the laws and regulations of the countries in which the business is located.

We compete fairly in the markets in which we operate.

We must work safely and apply industry best practice to the health, safety and wellbeing of our employees, customers, suppliers and the communities in which we operate.

We should aim to bring long-term benefits to DOMO, rather than short-term advantage for individuals at the expense of the organisation's long-term interests.

Our belief in people and teamwork requires cooperation with our colleagues across the DOMO Group to achieve our corporate goals.



*Trust and integrity  
are vital to DOMO.*

Our words and actions must show respect for the diverse range of people and cultures with whom we work and for their human rights.

Corrupt practices are unacceptable. No bribes or similar payments will be made to, or accepted from, any party.

All commercial transactions will be properly and accurately recorded.

Sales agents, subcontractors, consultants and similar advisers should be appointed in accordance with these principles and paid at a rate consistent with the value of their services.

Assets and confidential information should be fully protected and must not be used by employees for personal gain.

Employees must not engage in activities that involve, or could appear to involve, a conflict between their personal interests and the interests of DOMO. Employees shall exercise fair, objective and impartial judgment in all business dealings, placing the interests of DOMO over any personal interests in matters relating to the business of DOMO. A conflict of interest arises when your own personal interests influence your duty to act in the best interests of DOMO. You must avoid any situation which creates an actual or potential conflict of interest. Areas where conflicts might arise include: share ownership, direct or indirect personal interest in contracts, seeking or accepting gifts or entertainment beyond levels considered reasonable in your business environment, positions or relationships outside DOMO or use of confidential information.

DOMO does not make political donations.

You should report any potential or actual conflict of interest immediately to your line manager, the Chief Human Resources Manager, the Chief Legal Officer or the CEO. If in doubt, seek advice from any of them.



## 4.2 Speaking Up

Trust and integrity are vital to DOMO. Misconduct and malpractice breach trust and endanger our reputation and business. The best way of protecting trust is for employees who have genuine suspicions about wrongdoing to know that they have a safe environment in which to speak up without fear of retaliation or retribution.

Our policy on Speaking Up is contained in Schedule 2. It sets out examples of what constitutes wrongdoing and what employees should do if they wish to raise any concerns of wrongdoing. All employees are responsible for the success of this policy. Any reports made by employees will be taken seriously and investigated confidentially. Retaliation or retribution against anyone who comes forward in good faith with a genuine concern will not be tolerated.

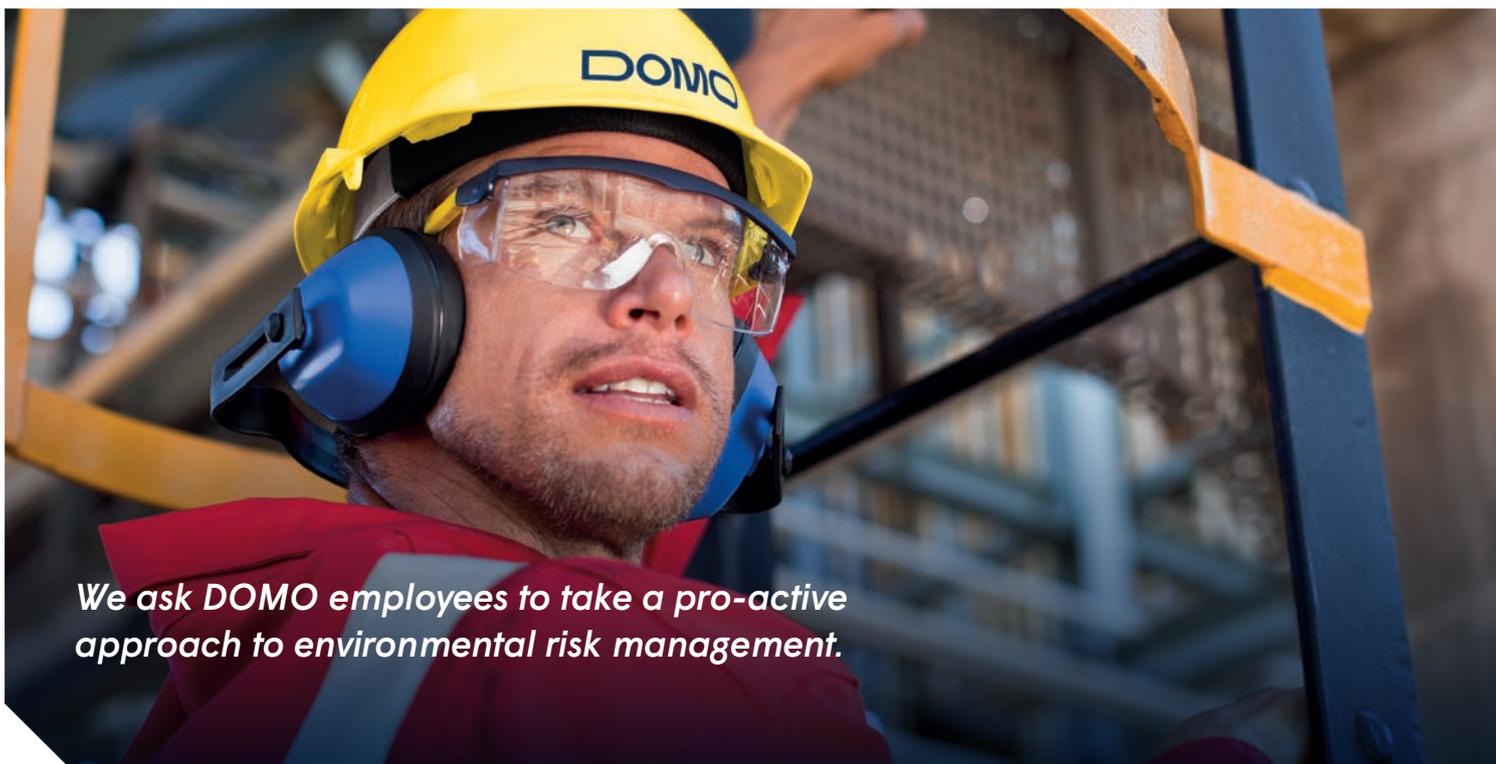
Our policy on Speaking Up  
is contained in **Schedule 2**.

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## 5. ENVIRONMENTAL RISK MANAGEMENT

We ask DOMO employees to take a pro-active approach to environmental risk management.

DOMO is committed to working towards Safety, meaning no injuries and no environmental damage. Our goal is to provide innovative, efficient and sustainable business solutions in support services to our customers.



*We ask DOMO employees to take a pro-active approach to environmental risk management.*

## 6. COMPETITION

DOMO's passion for success means that we will compete effectively and fairly in the markets in which we operate.

Uncompetitive behaviour is bad for our customers, makes us inward-looking and complacent and is unacceptable to the community at large. DOMO's passion for success means that we will compete effectively and fairly in the markets in which we operate.

Managers are responsible for ensuring that they comply with competition laws in their area of operations and that all relevant employees receive thorough training in this area, with manuals for ongoing reference. Competition compliance programs and manuals will be regularly updated and refreshed. Evidence of an active compliance program will be needed if you and DOMO are required to defend a prosecution by competition authorities.

Active compliance requires that you take an interest in competition issues, ask penetrating questions and demonstrate leadership in compliance. Identify the competition areas where your business is most at risk and deal with these in regular training sessions.

Acquisitions and divestments may give rise to the need for notifications to regulatory bodies and regulatory clearances under competition law.

Be aware of the possible requirement to disclose internal and external studies, reports and analyses of transactions and relevant markets (including papers submitted to the DOMO Board) when seeking competition clearances or when subject to investigation by competition authorities.

Tell employees about the powers of the competition authorities to make on-the-spot and other investigations, and what to do in these situations.

The Competition Law Compliance policy is set out in **Schedule 3**.



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All enquiries from competition authorities should be immediately reported to the Chief Legal Officer.



*DOMO's passion for success means that we will compete effectively and fairly in the markets in which we operate.*

## 7. OUR PEOPLE

Employees should feel that they can discuss, on a confidential basis, any problem associated with their employment with the Group.

The enterprising spirit of our employees is one of the great assets of an organisation like DOMO. Employees should feel that they can discuss, on a confidential basis, any problem associated with their employment with the Group. Recognise and reward employees for their achievements and positive behaviour. Bring evidence of inappropriate conduct or performance to the attention of the employee and allow the employee to respond to these allegations.

Except in the case of summary dismissal for serious misconduct, employees should be given a reasonable chance to remedy the inappropriate conduct or performance.

***CARE is a core value of DOMO. Beyond physical safety DOMO takes the mental health and wellbeing of employees at heart. Keep an eye of your own wellbeing and the wellbeing of your colleagues. Proactively seek support from your management, your HR or HSE colleagues whenever needed. We expect supervisors to pay a particular attention to the physical and mental health of our colleagues.***

### Occupational Health and Safety

DOMO is committed to achieving safety targets, meaning no injuries, no environmental damage and no detrimental impact on human rights. The Safety policy, which sets out the vision, values and behaviours and commitment required to work safely and ensure environmental compliance, is provided to all employees and is available on the DOMO website.

Acquaint yourself with the requirements of all applicable occupational health and safety laws.

Apply best operating practice in your industry with regard to safety and health.

Regularly review your risk management systems to properly identify, control and prevent accidents in the workplace. When accidents happen, employees should be treated fairly during the subsequent investigation.

It is DOMO policy to provide a safe working environment for all its employees (see Schedule 4).



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*Employees should feel that they can discuss, on a confidential basis, any problem associated with their employment.*

We are committed to developing a diverse workforce, and providing an inclusive and caring work environment in which everyone is treated in a fair and respectful way and feels included, irrespective of personality, gender, ethnicity, nationality, class, colour, age, sexual identity, disability, religion, marital status or political opinion (see Schedule 5).

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Safety procedures should never be compromised to meet operational targets.

All serious incidents will need to be explained to the Board.

### Grievances

Employees should feel that they can discuss, on a confidential basis, any problem associated with their employment with the DOMO Group. They should be able to raise such issues, confident that DOMO will provide a fair, impartial and confidential determination on the issue as quickly as practical.

### Inclusion & Diversity

DOMO is an equal opportunities employer. Employment and advancement within DOMO must be based on professional capability and qualifications.

Be careful how you interact with your colleagues in the workplace, particularly those in less powerful positions. Every employee should value their colleagues as individuals and be aware of the effect their actions and word can have on others. Be inclusive and alert to possible exclusion or harassment in the workplace and take care how you handle any resulting problems. DOMO regards actions that constitute harassment as serious misconduct.



*We respect the individual's right to freedom of association.*

#### Freedom of Association

We respect the individual's right to freedom of association. We relate to our employees through both collective and individual agreements, according to local law, custom and practice.

## 8. HUMAN RIGHTS

We support and uphold the principles contained in the Universal Declaration on Human Rights. In particular we will not tolerate child labour or forced labour in our own operations or those of our suppliers. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The minimum age for hazardous work is 18 years.

*We support and uphold the principles contained in the Universal Declaration on Human Rights.*

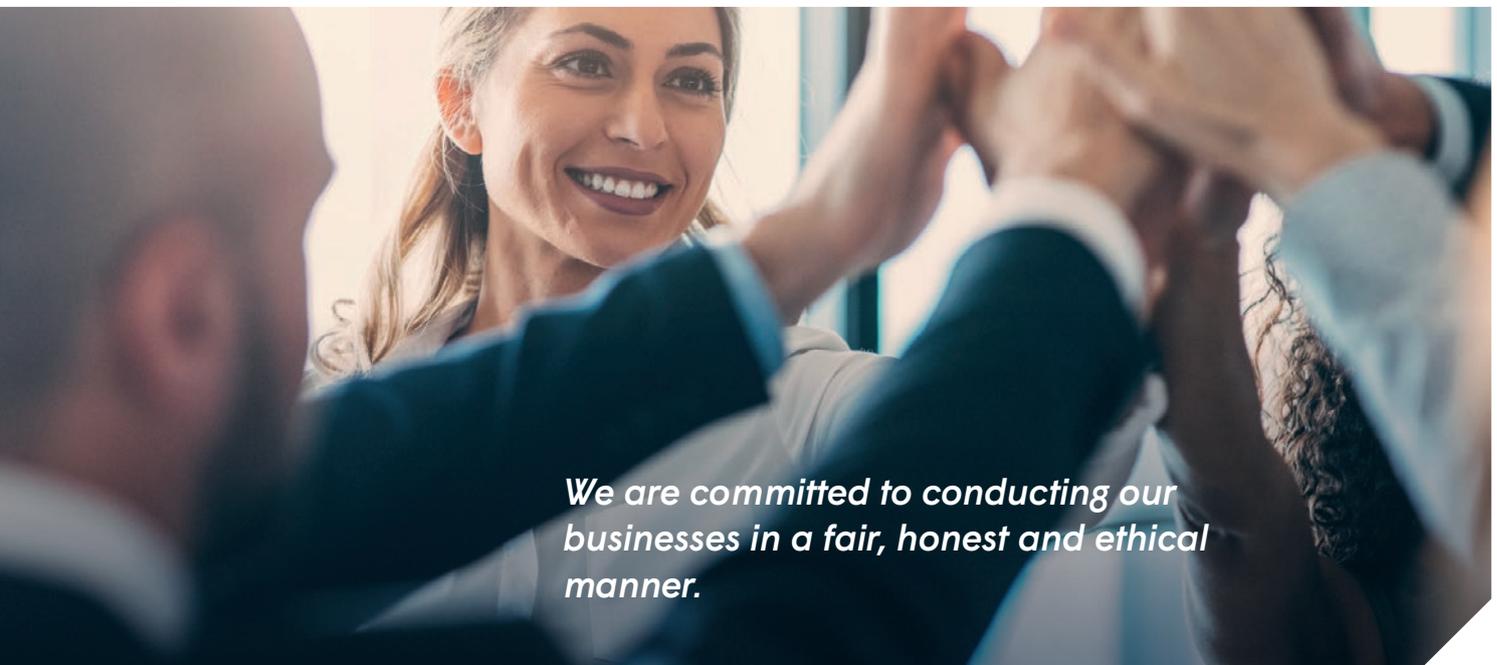
## 9. ANTI-BRIBERY AND CORRUPTION

To assist you in complying with these principles, DOMO has adopted an Anti-Bribery and Corruption Policy which can be found in **Schedule 8**.

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We are committed to conducting our businesses in a fair, honest and ethical manner, and in accordance with the laws and regulations of the countries in which we operate.

Corrupt practices are, therefore, unacceptable. We have a zero tolerance approach to bribery and corruption. You must not make bribes or similar payments to, or accept them from any party.



*We are committed to conducting our businesses in a fair, honest and ethical manner.*

## 10. SUPPLIERS

We are committed to being a responsible and valuable partner in the Chemical industry, continuing to build a sustainable business that serves its customers, employees and shareholder and the communities in which they live.

A strong and dynamic supplier base is essential to our long-term success. We rely on the expertise and skill of suppliers to meet customers' changing needs.

We are committed to working with suppliers to develop more efficient, safer and sustainable supply chains by abiding by the principles and values outlined in the Code of Conduct and Safety policy.

*We are committed to being a responsible and valuable partner in the Chemical industry, continuing to build a sustainable business.*

## 11. RISK MANAGEMENT

The effective management of risk is vital to the continued growth and is core to contribute to the success of DOMO. Our aim is to embed a strong risk management culture across the DOMO Group.

A strong Enterprise Risk Management and Internal Audit framework will, as part of the Group's Governance and Enterprise Risk Management Program, offer the ability to assess and mitigate risks, to offer value-added auditing by optimizing systems, processes and efficiencies.

The Risk Management Guidelines are detailed in **Schedule 6**.



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*Employees must keep confidential all information gained during the course of their employment.*

The basic principles of GDPR, the personal data of our employees that we process and our general rules of conduct regarding data protection are set out in **Schedule 9**.

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## 12. DATA PROTECTION AND PRIVACY

Employees must keep confidential all information gained during the course of their employment.

DOMO's policy is to maintain the privacy of information relating to its employees and customers in line with the GDPR regulations. The basic principles of GDPR, the personal data of our employees that we process and our general rules of conduct regarding data protection are set out in Schedule 9. Where there are more specific or deviating local privacy laws and regulations this policy will be adapted to the local legal requirements.

## 13. SOCIAL MEDIA

Social media like Facebook, LinkedIn and Twitter, use online technology to enable people and businesses to communicate easily via the internet.

In all our communications including via social media we are required to keep particular customer information confidential, to show respect for the diverse range of people and colleagues with whom we work.

DOMO's Social Media Policy →  
can be found in **Schedule 7**. P. 35  
This Policy establishes a set  
of guidelines and principles  
that DOMO's employees  
must follow when using  
social media.



## 14. AUDIT AND COMPLIANCE SIGN-OFF

Members of the DOMO Executive Committee (“**ExCom**”) will be asked either to sign off on compliance with the relevant areas of the Code of Conduct every year when the annual accounts are prepared, or to identify those areas on which they cannot sign off. The signoffs may be subject to audit testing by the Internal Audit Department.

STRONG VALUES

# ACCOUNTABILITY

We are responsible for the successful development and long-term profitability of our organization. We take ownership in responding to the needs of our stakeholders whilst always having DOMO's and society's interest in mind. We strive to reach the highest level of excellence.



A photograph of a person from behind, standing in a field of tall grass at sunset. Their arms are raised in the air, and the sky is a warm, golden color. The person is wearing a light-colored t-shirt.

## STRONG VALUES

# CARE

**We care about our people, our stakeholders, and our planet.**

We are mindful of the safety, well-being and growth of our employees. We cooperate and share knowledge to excel as a team.

We foster partnerships with our stakeholders and seek to extend collective knowledge to exceed expectations.

We are committed to providing sustainable solutions and engaging with our stakeholders to protect the planet.



STRONG VALUES

# CURIOSITY

We embrace creativity to achieve our company's purpose. We innovate and we courageously explore new horizons to excel in all we do. It is part of our culture to ask bold and brave questions.

STRONG VALUES

# RESPECT

We respect all the people we work with. We demonstrate an inclusive and open mind-set, and we embrace each other's differences. We communicate transparently and we act with integrity to foster trust.

# SCHEDULES

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## Schedule 1

# CORPORATE SOCIAL RESPONSIBILITY POLICY

## Introduction

DOMO is a Chemical company with operations across the Globe.

This CSR policy was adopted by the DOMO ExCom and has been communicated to all our employees. We are committed to implementing it on an ongoing basis.

DOMO is committed to reporting and communicating openly on its response to CSR issues.

This policy will be reviewed from time to time and updated as necessary to reflect developments in our businesses and in best practice.

## Business Integrity

All DOMO employees are expected to conduct business so as to enhance the Group's reputation. The overriding principles which should govern our behaviour and business dealings are:

- All business should be conducted in accordance with the laws and regulations of the countries in which the business is located.
- We compete fairly in the markets in which we operate. Corrupt practices are unacceptable. No bribes or similar payments will be made to, or accepted from, any party.
- Employees must not engage in activities that involve, or could appear to involve, a conflict between their personal interests and the interests of DOMO.
- Employees who come forward in accordance with the 'Speaking Up' policy when they have genuine suspicions of wrongdoing anywhere in the organisation will be taken seriously and will not be victimised. They may raise their concerns with their line manager, the Chief Human Resources Officer or the in-house business lawyer in their business division. Their concerns will be properly investigated and any necessary action taken.
- DOMO does not make political donations.

## Environment

We value the natural environment and are firmly committed to sound environmental practice in our operations. Our businesses are required to comply with relevant environmental laws and regulations and to adopt the following principles:

- Follow DOMO's Safety policy - commit and contribute towards sound environmental practices in our daily operations.
- Improve the efficiency of our use of raw materials and energy.
- Minimising emissions and waste.
- Responding to community concerns with integrity, honesty and respect.
- Seek out suppliers who have a proactive approach to environmental risk management and who manage natural resources responsibly.

## People

The enterprising spirit of our employees is one of our great assets. Employees should be treated justly and fairly and rewarded for their achievements. Our employment policies commit us to:

- Providing a safe working environment through best practice in health and safety management in all our businesses.
- Being an equal opportunities employer, committed to developing a diverse workforce where everyone is treated fairly irrespective of gender, sex, race, sexual orientation, age, disability, religion or ethnic origin.
- Creating an environment where everyone is encouraged to give their best and realise their full potential, through the provision of learning and development opportunities.
- Ensuring that employees can discuss any problem connected with their work confident that they will receive a fair, impartial and confidential review of the issue.

We respect the individual's right to freedom of association. We relate to our employees through both collective and individual agreements, according to local law, custom and practice.

## Community

- We aim to make a positive contribution to the communities in which we operate and to be a responsible neighbour.
- Our businesses will determine their community investment priorities to suit the needs of their local communities.
- Our Community program encourages our employees to be active in the community, allows reasonable requests for volunteering time and provides financial support for community projects.

## Human rights

We support and uphold the principles contained in the Universal Declaration on Human Rights. In particular we will not tolerate child labour or forced labour in our own operations or those of our suppliers.

## Suppliers

We are committed to being a responsible and valuable partner in the supply chain, continuing to build a sustainable business that serves its customers, employees and shareholder and the communities in which they live.

A strong and dynamic supplier base is essential to our long-term success. We rely on the expertise and skill of suppliers to meet customers' changing needs.

We are committed to working with suppliers to develop more efficient, safer and sustainable solutions by abiding by the principles and values outlined in the Code of Conduct and Safety policy.

## Schedule 2

# SPEAKING UP POLICY

For employees of the Domo Group based in France the Speaking up policy has been modified to fully take into account the requirements of the Law no. 2016-1691, known as the "Sapin II" law and the document "Procédure de lancement d'alerte" should be applicable to those employees instead of this Schedule 2.

## 1. This Policy

The purpose of this Policy is to reinforce and reaffirm DOMO's commitment to an open speaking up process in which employees are encouraged to raise any concerns of Wrongdoing they may have. In today's environment, DOMO employees remain DOMO's first and best line of defence to Wrongdoing; when employees detect and report Wrongdoing, DOMO can take prompt, corrective action to fix it. We recognize that the early detection and reporting of Wrongdoing depend on maintaining a culture of trust and integrity in which all employees:

- (a) Are encouraged to report potential Wrongdoing as soon as possible, knowing that their concerns will be taken seriously and that appropriate action will be taken;
- (b) Know and use the channels available to them to report concerns of Wrongdoing; and
- (c) Trust that the speaking up process is confidential and has no tolerance for retaliation or retribution.

## 2. What Activities Are Covered By This Policy?

Subject to any applicable local law, this Policy covers employees who wish to disclose actual or planned activities covering any one or more of the matters listed below. In this Policy, these activities are called "Wrongdoing":

- (a) Criminal activity;
- (b) Dangers to health and safety;
- (c) Damage to the environment resulting from the release of toxic substances or environmental waste or violation of applicable environmental law or regulation;
- (d) Questionable accounting, internal accounting or auditing mismanagement, including actual or threatened:
  - (i) Fraud or deliberate error in the preparation, evaluation, review or audit of any DOMO financial statement;
  - (ii) Fraud or deliberate error in the recording and maintaining of DOMO's financial records;
  - (iii) Deficiencies or noncompliance with DOMO's internal accounting controls;
  - (iv) Misrepresentations or false statements to or by senior officers or accountants regarding a matter contained in DOMO's financial records, financial reports, or audit reports; or
  - (v) Deviation from full and fair reporting of DOMO's financial condition;
- (e) Bribery or corruption;
- (f) Failure to comply with any legal or regulatory requirements not specifically mentioned above;
- (g) Breach of DOMO's Code of Conduct or other policies or procedures;
- (h) The unauthorised disclosure of trade secrets or proprietary or confidential information;
  - (i) Conduct likely to damage DOMO's reputation; or
  - (j) The deliberate concealment of any of the above.

If you have a genuine, good faith concern that any Wrongdoing has happened or is likely to happen, you should report it under this Policy. The various ways you can do this are explained in section 3 below. If you are uncertain as to whether an activity is covered by this Policy, you should speak to your line manager or, if you would prefer, any member of your local HR Team.

This Policy, and the reporting channels set forth in section 4 below, do not cover complaints relating to your own personal circumstances, such as the way you have been treated at work. Instead, complaints about your own personal circumstances should be reported to your line manager or your human resources representative, who will take appropriate action. The confidentiality of any employee lodging a good faith complaint relating to their own personal circumstances will be respected, and no retaliation or retribution will be tolerated.

### 3. Who Can Speak Up Under This Policy?

This Policy and the procedures described in this Policy are available to every employee of DOMO and, in those countries where it is legally permissible, any party with whom DOMO has a business relationship (such as DOMO's customers, suppliers, contractors, agents and distributors).

### 4. How To Raise A Concern

We hope all employees will feel able to raise concerns about actual or possible Wrongdoing openly and, where they feel comfortable, directly with their line manager. Generally speaking, your line manager will be in a position to resolve a concern of Wrongdoing quickly. A standard template to raise your concerns will be made available on the Intranet.

**You can communicate a concern of Wrongdoing using any of the channels listed below:**

- (a) Your line manager or respective ExCom member.

**However, your line manager is not your only option. Other channels include:**

- (b) The Chief Human Resources Officer:  
Edyta Gorecka
- (c) The Chief Legal Officer:  
Bernard De Vos
- (d) The CEO:  
Yves Bonte

Regardless of the channel used, employees must report suspected or potential Wrongdoing of which they are aware as soon as practicable. Reporting Wrongdoing as soon as possible allows DOMO to undertake an investigation and remedy or eliminate it and to minimize any adverse consequences which may arise from it.

You may report suspected Wrongdoing anonymously in those countries where it is legally permissible. However, as it is much more difficult and often impossible to investigate suspicions which are reported anonymously, you are strongly encouraged to give your identity. Any reports made, whether anonymous or not, should include sufficient detail to allow DOMO to investigate the matter fully. For example, it is important to provide information about the names of the people allegedly involved in, or witness to, the incident(s), the dates and times of the incident(s) (approximate or exact), where the incident(s) occurred, and why the employee believes the incident(s) should be reported. Insufficient detail may prevent DOMO from addressing the matter appropriately.

Any employee who believes that he or she has been personally involved in Wrongdoing is expected to report such incident(s). Self-reporting will be considered when deciding whether or what disciplinary action may be appropriate.

The goal of this Policy is to provide an internal mechanism for reporting, investigating and remedying any Wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally. Sometimes employees will have concerns that relate to the actions of a third party, such as a customer, supplier, or service provider. We strongly encourage you to report such concerns internally before raising them in good faith with any third party. You should utilize one of the channels for reporting set out above for guidance.

## 5. Confidentiality Is Respected

If you report Wrongdoing in good faith under this Policy, your identity and the information you provide will be shared only on a "need-to-know" basis with those responsible for investigating or resolving the concern.

## 6. No Retaliation

We understand that employees are sometimes worried about possible repercussions associated with complaints of Wrongdoing. Please know that we encourage openness and will support any employee who raises genuine concerns in good faith under this Policy (called a "Protected Disclosure"), even if they turn out to be mistaken.

We will not tolerate retaliation or detrimental treatment of any kind as a result of any employee who makes a Protected Disclosure or participates in an investigation into a Protected Disclosure. Any employee found to have retaliated against another employee for making a Protected Disclosure or assisting in an investigation into a Protected Disclosure will be subject to appropriate discipline, up to and including the possible termination of employment. Retaliation or detrimental treatment includes, among other things, dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

## 7. Investigative Process

Once you have raised a concern, DOMO will evaluate it to determine the appropriate next steps.

In some cases, DOMO may appoint an internal or external investigator or team of investigators, including staff with relevant investigative experience or with special knowledge of the subject matter, to determine objectively what happened and whether such an occurrence violated DOMO Policy. No one will be judged to have engaged in Wrongdoing or misconduct until the investigation, if any, is complete and they have had a chance to respond to the allegations. All investigators will treat witnesses in a professional manner and with dignity and respect. At the conclusion of any investigation, the investigators may make recommendations for change to enable DOMO to minimise the risk of future Wrongdoing.

DOMO will aim to keep any employee who raises a concern of Wrongdoing informed of the progress of any investigation and its likely timetable for completion. However, sometimes the need for confidentiality and legal considerations may prevent us from giving the employee specific details of the investigation or any disciplinary action taken as a result.

It is a very serious matter to raise a concern which you know to be false, and if we determine that a false complaint has been made maliciously, in bad faith, or with a view towards personal gain, we may conclude that such actions amount to gross misconduct, warranting discipline up to and including the possible termination of employment.

## 8. Cooperation

All employees are expected to cooperate fully with any DOMO-designated investigators, providing complete and truthful information. Any employee who fails to cooperate with a DOMO investigation or lies to or misleads DOMO will be subject to disciplinary action up to and including termination of employment.

Employees who have been informed or become aware of ongoing investigations for which they have potentially relevant records (e.g., memoranda, electronic mail, instant messages, files, notes, photographs, and recordings, etc.) must retain these records and provide them to DOMO. Any employee who knowingly destroys or alters potentially relevant records or information will be subject to disciplinary action up to and including the possible termination of employment.

## 9. Responsibility For The Success Of This Policy

The DOMO Board has overall responsibility for this Policy and for reviewing the effectiveness of actions taken in response to concerns raised under this Policy. The DOMO Board has responsibility for:

- (a) the provision of appropriate protection against retaliation and retribution to the Group's employees who make Protected Disclosures; and
- (b) the communication and compliance with this Policy throughout the Group.

This Policy does not form a part of any employee's employment contract, or otherwise create one, and it may be amended from time to time.

All employees are responsible for the success of this Policy and should ensure that they use it to disclose any suspected Wrongdoing. Employees are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief Human Resources Officer.

More information on the processing of your personal data can be found in **Schedule 9 (Data Protection and Privacy Policy)**.



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## 10. Processing of Personal Data

The receipt and analysis of a Concern, as well as the investigation carried out, will include the processing of personal data by the DOMO entity that is your employer or with whom you collaborate (such entity being considered as the data controller) in order to ensure the proper management of the Concern received.

### Schedule 3

## COMPETITION LAW COMPLIANCE POLICY

DOMO's policy is to comply with all relevant competition laws everywhere it operates. A competition compliance program has been developed in order to ensure that:

1. Appropriate training programs for employees are developed, in conjunction with specialized legal experts, covering relevant areas of compliance.
2. Programs are developed for refresher training of existing employees and for the induction of new recruits, so that employees think about competition issues relevant to their particular area of operation.
3. A Competition Law Compliance Manual has been prepared with specialized legal experts and provided to employees who are in positions where they may be capable of breaching the competition laws. Competition laws can be relevant to sales representatives as well as managers, and in regional locations as well as cities. The manual is also available on the DOMO Intranet.

### Items covered in the Education and Training Programs

This list is not exhaustive. The training programs are tailored to your particular business requirements and local circumstances as the case may be.

1. Talking with competitors is always dangerous. Do not do so unless you are comfortable with the possibility that you may, at a later date, have to provide a full account of the conversation to the local competition authority.
2. Where you have to deal with a competitor — for example, as a supplier or a customer or on a matter relating to industry standards — be wary. Do not let the conversation slide across the boundary into competitive issues. Keep a record of what was discussed. Seek advice first.
3. Any dealings with your competitors, which improve your bottom line or help to justify your investment, are probably illegal. Take advice first.
4. Any acquisition that is justified because it gives you a "dominant market position" has problems. Any document containing this kind of language will be of great interest to your local competition authority and could get you into trouble. Seek advice first.
5. Imposing competitive restraints on customers, distributors or vendors can get you into trouble. When in doubt, seek advice.
6. "Purpose" and "likely effects" can get you into as much trouble in some jurisdictions as actual outcomes. Think about where your motives and actions are likely to take you. If your "purpose" is anticompetitive (including attempting to price so aggressively that it drives a competitor out of the market) it can be illegal even if it is ineffective. Seek advice before talking or acting.
7. Prepare your employees for dealing with a "dawn raid" by competition authorities. Have a list of contacts ready, including DOMO's competition legal advisers.
8. Keep employees informed about penalties for both themselves and DOMO if they engage in anticompetitive conduct. In some jurisdictions employees, as well as DOMO, can be personally liable for pecuniary or criminal penalties.

The following special mailbox has been created for any questions or the filing of the agenda and summary or minutes of meetings with competitors or trade associations:  
mailto:competition@domo.org.

For any urgent assistance in this area, contact Bernard De Vos, Chief Legal Officer, e-mail:  
Bernard.DeVos@domoig.com.

## Schedule 4

# HEALTH, SAFETY AND ENVIRONMENTAL POLICY

Our vision is to have a safety culture that makes zero injuries a real possibility and it is our policy to provide and maintain a healthy and safe working environment for everybody that works for Domo.

It is our strong belief that all accidents, occupational and process, are preventable and accordingly, safety is always a priority in all our business activities.

## COMPLIANCE REQUIREMENTS

### Health and Safety

It is the responsibility of each member of the Executive Committee reporting to the Chief Executive Officer. All Executive Committee members must ensure that this policy is implemented in their area of responsibility and shall establish:

- A local Health and Safety Policy in compliance with this Policy and with any additional local statutory requirements.
- A local steering system that supports the achievement of the CARE TO BE SAFE and Safety Policy. Local procedures shall align with corporate, local statutory standards, whichever is the most stringent and use of Best Practices within the industry.
- Safety competence standards for all positions and appropriate training provided.
- Systematic identification of major hazards and assess the risks associated with their operations and implement appropriate risk reduction measures. The risk assessment shall be updated every three years or sooner in the case of significant changes that may affect the risk level.
- An emergency plan at every unit of site for handling accidents and incidents with risk to people, property or the environment.
- An internal audit system to follow up compliance with the steering system which is aligned to the corporate audit system. This shall also contribute to the internal audit requirements of the ISO 45001 standard for occupational health and safety management.
- The health and safety implications of investments and new product proposals shall be formally assessed for compliance with statutory regulations and requirements of the steering system.
- Reporting of all accidents and near miss incidents, they shall be investigated and actions followed up to prevent recurrence and with focus on learning. Serious incidents shall be reported to the Executive Committee.
- Safety performance indicators shall be established at all management levels, integrated into annual business plans and personal or team performance objectives, and systematically reviewed. These performance indicators shall be a combination of outcomes and proactive measures.
- Communication and consultation with employees on health and safety issues to increase safety awareness and understanding.

- Adequate facilities for the welfare of employees at work.
- Appropriate first-aid training and equipment.

## Environment

We value the natural environment and are firmly committed to sound environmental practice in our operations. Our businesses are required to comply with relevant environmental laws and regulations and to adopt the following principles:

- Commit and contribute towards sound environmental practices in our daily operations.
- Improve the efficiency of our use of raw materials and energy.
- Minimizing emissions and waste.
- Responding to community concerns with integrity, honesty and respect.
- Seek out suppliers who have a proactive approach to environmental risk management and who manage natural resources responsibly.

## Organization, responsibilities, and authorizations

Managers at all levels are accountable for the Health, Safety and Environment performance of their operations/ activities, for compliance with legal and statutory requirements and requirements laid down in the Corporate and Local Management System.

Managers are responsible for:

- reducing risk to as low as reasonably practical.
- setting health, safety and environmental standards and goals, monitoring, auditing and completing agreed actions on time as well as reviewing performance to achieve operational conformance and continuous improvement in safety.
- developing employees to work safely.

All employees and contractors are responsible for

- having the appropriate competence for safe working.
- always adhering to safety technical standards and rules.
- addressing own and others' 'at risk' behaviours and to reinforce 'safe' behaviours.
- taking immediate action to correct, report and follow up near misses and hazardous conditions.

The Health, Safety and Environment function are responsible for:

- monitoring that DOMO's activities are carried out in conformity with statutory regulations and HSE requirements laid down in the Steering System
- making information concerning these matters available to all units
- advising the organization in these matters
- facilitating networking and the exchange of best practices in these fields.
- In cooperation with Corporate Health, Safety and Environment, all units shall be prepared to exchange information and develop common attitudes and standards across all DOMO departments.

## Non-Conformity

Any non-conformities to this document shall be handled in accordance with the non-conformity process.

## Schedule 5

# DIVERSITY POLICY

## 1. Context and Scope of Policy

Diversity is an integral part of DOMO's corporate strategy and this policy reflects the commitment of the Board and of the ExCom to diversity in the workforce.

## 2. Diversity Vision Statement

DOMO's leadership, management and employees are committed to creating and maintaining a culture which delivers outstanding performance and results.

Diversity is essential to DOMO's long term success.  
DOMO values and fosters diversity because it allows:

- customers' needs, both today and in the future, to be recognised and addressed;
- all employees to feel valued, included and able to perform to their best; and
- DOMO to have access to the widest possible talent pool.

## 3. Definition and benefits of Diversity

Offering an inclusive environment is the best way to attract, leverage and maintain diversity within DOMO. An environment that recognises and values all those differences in personalities, background, upbringing, culture and experience that make each of us unique and distinctive.

DOMO is committed to selecting, recruiting, developing and supporting people solely on the basis of their professional capability and qualifications, irrespective of gender, ethnicity, nationality, class, colour, age, sexual identity, disability, religion, marital status or political opinion.

We believe that a diverse workforce provides the best source of talent, creativity and experience. People with different backgrounds and life experiences can identify opportunities and address problems from different perspectives.

By encouraging diversity, we enhance our potential to generate new ideas and so improve our ability to adapt to change.

This means we are better able to understand the differing needs of our customers globally and by delivering outstanding service to them, provide superior returns to our shareholders.

A diverse workplace is more interesting and attractive to existing and potential employees, improving employee engagement and retention.

#### 4. Diversity at DOMO

In every country and culture, DOMO aims to be an employer of choice that attracts the best talent. We select, retain and develop the best people for the job on the basis of merit and job related competencies – without discrimination. We will expect external hiring partners to source talent without discrimination.

DOMO will offer processes, programs and tools to help our talent acquire the knowledge, skills and behaviours and realize their potential within DOMO.

On an annual basis, the HR team will review with the business:

- the relative proportion of women and men in the workforce at all levels;
- statistics and trends in the age, nationality and professional backgrounds of DOMO's population;
- progress on measurable objectives for achieving gender and nationality diversity.

DOMO's employees will demonstrate, through their actions and words, that practising inclusion and valuing diversity is a key element in DOMO's culture.

In particular, DOMO people managers & team leaders will:

- actively maintain an open and inclusive working environment;
- have zero tolerance for any form of discrimination or harassment;
- be responsive to the varying expectations of employees, including work-life balance;
- base all recruitment decisions purely on the grounds of merit after encouraging applications from all suitably qualified individuals;
- base all promotions on performance, potential and active demonstration of DOMO values;
- provide employees with an environment that enables them to achieve success.

Every employee of DOMO should value their colleagues as individuals and be aware of the effect their actions and words can have on others.

Please contact your Human Resources representative with any queries about this policy.

## Schedule 6

# RISK MANAGEMENT

The effective management of risk is vital to the continued growth and is core to contribute to the success of DOMO. Our aim is to embed a strong risk management culture across the Group.

A strong Enterprise Risk Management and Internal Audit framework will, as part of the Group's Governance and Enterprise Risk Management Program, offer the ability to assess and mitigate risks, to offer valued-added auditing by optimizing systems, processes and efficiencies.

Wherever we operate, we will:

- identify, analyse and rank risk issues in a consistent manner, using common systems and methodologies;
- manage the risks faced by the Group at a local level, (as well as on a regional, business unit level and enterprise-wide basis);
- make our risk understanding and our agreed tolerance for risk a key consideration in our decision making;
- incorporate key risks and mitigation plans into strategic and operational business plans; and
- embed risk management into our critical business activities, functions and processes.

DOMO aims to continuously improve internal control systems and risk management processes which are regularly reviewed and cleared by the Board. We will continue to fulfil stringent governance requirements for risk management.

Further details on Group Risk Management can be obtained from the Internal Audit Department.

## Schedule 7

# SOCIAL MEDIA POLICY

## Policy overview

DOMO recognises that social media is an effective tool for sharing information and opinions with family, friends, and communities around the world, and that it is increasingly a facilitator of corporate and business engagement. However, the use of social media also presents certain risks and carries with it certain responsibilities. To guide employees in making responsible decisions about their use of social media, DOMO has established this policy. It is designed to protect the interests of the company, its employees and its customers and suppliers, to ensure that any references to DOMO or its subsidiary companies do not breach confidentiality requirements, and to otherwise ensure compliance with DOMO's Code of Conduct.

The DOMO Group Social Media Policy applies to all employees who work for DOMO or one of its affiliated companies.

## What is social media?

Social media includes all means of communicating or posting information or content of any sort on the Internet and all forms of social computing. Social media platforms take on many different forms, including, but by no means limited to, your or someone else's blogs or microblogs (e.g. Twitter, Tumblr), content communities (e.g. YouTube), social and professional networking sites (e.g. Facebook, LinkedIn), forums and discussion boards (e.g. Whirlpool, Google Groups), online encyclopaedias (e.g. Wikipedia) and virtual game and social worlds (e.g. World of Warcraft, Second Life).

The application of social media is growing and evolving rapidly. This policy also covers future applications of social media in whatever form they may take.

## Why has DOMO developed a social media policy?

DOMO - and by extension, its employees - must maintain certain standards when it comes to what and how it communicates, both internally and externally. The same principles and guidelines found in DOMO's policies, including the Code of Conduct and the Health and Safety Policy, apply to online activities, including those relating to social media. Ultimately, each individual is solely responsible for what he or she posts online. Before creating online content, it is necessary to consider the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of co-workers, or adversely affects customers, suppliers, or people who work on behalf of DOMO or its affiliated companies may result in disciplinary action up to and including termination. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct, or which divulge confidential information of DOMO, its customers or suppliers and work-related matters of its employees will not be tolerated. What happens if someone breaches the terms of this policy?

Failure to comply with this policy could result in disciplinary action against an employee or employees, up to and including termination of employment. It may also result in legal action being taken by third parties against the company or one or more of its employees.

## GUIDING PRINCIPLES

### Be respectful

Be fair and courteous to your co-workers, customers, suppliers, and people who work on behalf of DOMO or its subsidiary companies. Avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening, or intimidating, that disparage co-workers, customers or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion, age, or any other status protected by law or company policy.

### If it's online, it's publicly available

Remember that co-workers, customers, and suppliers often have access to the online content that you post. As a matter of best practice, DOMO recommends employees set privacy settings for personal social media pages or sites at the highest level of security.

### Maintain confidentiality

Maintain the confidentiality of DOMO's trade secrets and private information and the confidential information of its customers or suppliers. Trade secrets and private information may include information regarding the development of processes, products, services, know-how and technology, and financial results. Do not post pricing, financial or operational information, internal reports, policies, procedures or other internal business-related confidential communications, including business travel or appointments, which is not otherwise in the public domain. Also, do not post any customers' or suppliers' confidential information that is not public knowledge.

### Be transparent

Identify yourself as an employee any time you create a link from your blog, website or other social networking site to a DOMO (or subsidiary company) website. If DOMO (or one of its subsidiary companies) is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of DOMO or its subsidiary companies, or their employees, customers, suppliers, or people working on their behalf. Should you publish a blog or post content online related to the work you or DOMO (or its subsidiary companies) do, it is best to include a disclaimer, such as "The postings on this site are my own and do not necessarily reflect the views of DOMO or its subsidiary companies."

### Only authorised spokespeople can act on behalf of DOMO

DOMO identifies those employees authorised to speak to the media on DOMO's behalf. This applies to all company communications, including those made using social media. Unless you are authorised by DOMO to speak on DOMO's behalf, you should not represent yourself as a spokesperson for the company.

### You act as an individual

You are personally responsible for the privacy and related security risks for all of your posts and other communications using social media.

### There's really no such thing as "delete" on the Internet

Make sure you are honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything. Therefore, even deleted postings can be searched. Never post any information or rumours that you know to be false about DOMO or its subsidiary companies, or their employees, customers, suppliers, or competitors.

### Using social media at work

Refrain from using social media while on your work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with DOMO policies. Do not use company email addresses to register on social networks, blogs or other online tools utilized for personal use.

### No retaliation

DOMO prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

## Schedule 8

# ANTI-BRIBERY AND CORRUPTION POLICY

For employees of the Domo Group based in France this schedule 8 has been modified to fully take into account the requirements of the Law no. 2016-1691, known as the "Sapin II" law and the document "Code de Conduite Anti-Corruption" should be applicable to those employees instead of this Schedule 8.

For employees of the Domo Group based in Germany this schedule 8 has been modified into Schedule 8a in order to comply with the supplementary legal requirements and restrictions under German law and to clarify the legal situation by means of examples.

## 1. This Policy

### 1.1 This Policy:

- (a) sets out our responsibilities, and the responsibilities of those working for us, in relation to bribery and corruption; and
- (b) provides information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.
- (c) In this Policy the terms "we", "our", "us" and "DOMO" refer to DOMO Chemicals Holding NV and its affiliated companies.

### 1.2 You must ensure that you read, understand and comply with this Policy.

## 2. Who is covered by the Policy?

This Policy applies to all individuals working for or on our behalf at all levels, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, third party service providers, agents, sponsors, or any other person associated with us, wherever located (collectively referred to as "**Workers**" in this Policy).

## 3. Our Policy

- 3.1 We conduct our business in an honest and ethical manner. Corrupt practices are unacceptable, and we take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity and respect in all our business dealings and relationships wherever we operate, and implementing and enforcing effective systems to counter bribery.  
We will comply with the legal and regulatory framework in each country in which we operate.
- 3.2 We also expect those that we do business with to take a similar zero tolerance approach to bribery and corruption. Before entering into an agreement with any third party who will act on behalf of DOMO, DOMO will perform proper and appropriate due diligence and obtain from the third party certain assurances of compliance.
- 3.3 This Policy forms a part of DOMO's Code of Conduct, as amended and supplemented from time to time.

#### 4. Responsibility for the Policy

- 4.1 This Policy has been approved by the DOMO Board in order to show DOMO's commitment to dealing with bribery and corruption issues. The DOMO ExCom has responsibility for monitoring compliance with this Policy and will report to the DOMO Board, through the Chief Executive Officer, on its monitoring activities.
- 4.2 Management and senior staff at all levels are responsible for implementing this Policy in their respective workplaces and for ensuring those reporting to them are made aware of and understand this Policy.

#### 5. What are bribery and corruption?

- 5.1 Corruption is the abuse of public or private office for personal gain.
- 5.2 A bribe is an inducement or reward offered, promised or provided to a government official or a participant in a private commercial transaction in order to gain any commercial, contractual, regulatory or personal advantage by improper performance of a relevant function or activity. Whilst bribery of government officials or private individuals is equally prohibited under this policy, particular care needs to be taken when dealing with the former as anti-corruption laws are generally more onerous, with specific penalties applying, when government officials are involved. As a consequence, some parts of this Policy are more strict when relating to governments (for example, see section 6).
- 5.3 Examples of bribery include the following:

##### **Offering a bribe**

You offer a potential client tickets to a major event on the condition that they agree to do business with us, favour us over a competitor or reduce their price.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. DOMO may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

##### **Receiving a bribe**

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to agree to this as you would be doing so to gain a personal advantage.

##### **Bribing a foreign official**

You arrange for the business to make a payment to a foreign official to speed up an administrative process (for example, issuing a licence or planning consent, or clearing customs).

The offence of bribing a foreign public official is committed as soon as the offer is made. This is because it is made to gain a business advantage for DOMO. DOMO may also be found to have committed an offence.

Bribing a government official in one country can result not only in a breach of local law but the laws of other countries as well. For example, bribing a foreign official could result in breaches of one or more of USA, UK or European Union laws. The penalties for breaching these laws can range from substantial fines or imprisonment as well as adversely impacting not only DOMO reputation but that of all Workers.

In addition to direct payments of money or excessive gifts, other examples of bribery could include the following made at the direction, or for the benefit, of a government official or a commercial business partner: (a) excessive travel, meals, entertainment or other hospitality; (b) contributions to any political party, campaign or campaign official; or (c) charitable contributions or sponsorships.

#### 5.4 Avoid Conflicts of Interest

Workers may place themselves in a position where they could breach anti-bribery or corruption laws if they have a conflict of interest, particularly in relation to contracts. These conflicts arise where a personal interest of a Worker may conflict with the interests of DOMO. Examples of areas where a conflict might arise include a personal interest in a contract, whether direct (for example where the Worker is a counterparty to a contract) or indirect (for example where the Worker has an interest in the counterparty to the contract by way of share ownership or a close relative of the Worker is, or has an interest in, the counterparty), employment outside of DOMO, the use of information confidential to DOMO in a personal transaction or seeking or accepting gifts or entertainment beyond the guidelines set out in section 6 of this policy.

As a result, Workers must not engage in activities that involve, or could appear to involve, a conflict of interest. If you are not sure whether or not a particular situation may give rise to a conflict of interest, contact a member of the ExCom.

## 6. Permissible payments

- 6.1 Only in very limited circumstances, and only when permitted by applicable law, may an item of value be given to government officials. **THIS MAY ONLY BE DONE IF YOU HAVE PRIOR WRITTEN APPROVAL FROM THE EXCOM.** Those items which may be given include non-lavish, reasonable entertainment, meals, gifts of a nominal value and other business courtesies if it has been determined that such a gift would not violate any applicable law. Such entertainment, meals, gifts of a nominal value and other courtesies may not be made to government officials, unless a member of the ExCom has given prior written approval.
- 6.2 Facilitation payments. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official, such as obtaining a permit to do business in a foreign country, obtaining police protection, or processing a visa, customs invoice, or other government paper. They may be common in some jurisdictions in which we operate. Kickbacks are typically payments made in return for a business favour or advantage and are strictly prohibited. All Workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us. We will not make or accept kickbacks of any kind, we do not make facilitation payments unless expressly authorized by the ExCom that should also check if it is permitted according to the applicable laws.

- 6.3 Gifts and hospitality. This Policy does not prohibit normal, reasonable and appropriate hospitality (given and received) to or from third parties if its purpose is to improve our company image, present our products and services, or establish or maintain business relations.
- 6.4 Our Workers are only permitted to give or receive gifts or hospitality that are reasonable, proportionate, justifiable and in accordance with this Policy and any applicable gifts and/ or hospitality policies.
- 6.5 It is prohibited to give a gift or hospitality with the expectation that a business advantage will be received or to reward a business advantage given. Our Workers cannot solicit gifts. Gifts may only be accepted if they are given on an infrequent basis, for the sole purpose of cultivating or enhancing a business relationship, and be below the financial limit in section 6.8 below.
- 6.6 Hospitality or gifts must not, however, be given to or accepted from customers or suppliers, regardless of their value, in the period leading up to and during a tender process or contract negotiations in which that customer or supplier is participating. If Workers are not sure whether they are in a period leading up to a tender, contact the ExCom.
- 6.7 Workers may not accept or provide any hospitality or gift to or on behalf of a government official without prior approval of the ExCom.

The following are considered "government officials":

- Officers, employees or representatives of any government, department, agency, bureau, authority, instrumentality, or public international organisation;
- Persons acting on the government's behalf;
- Employees of entities that are owned or controlled by a government; and
- Candidates for political office.

- 6.8 Workers may not accept or provide gifts in relation to any non-governmental third party with a value in excess of €75, or equivalent local currency, without the approval of their line manager and must ensure that it is solely for the purpose of cultivating or enhancing a business relationship. Gifts with a value in excess of €250, or equivalent local currency, from or to a third party within 12 months will, in addition, require the approval of the ExCom.
- 6.9 As set forth in Section 9, our Workers and other persons working on our behalf are required to record any gift or hospitality given or received (including, where relevant, related expenditure) promptly and accurately. Such records are subject to managerial review.

## 7. Donations

- 7.1 We do not make contributions to political parties, organisations or individuals engaged in politics.

## 8. Your responsibilities

- 8.1 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All Workers are required to avoid any activity that might lead to a breach of this Policy.

- 8.2 You must notify your line manager or the ExCom as soon as possible if you believe or suspect that a breach of or conflict with this Policy has occurred, or may occur in the future.
- 8.3 Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct.

## 9. Record keeping

- 9.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 9.2 You must keep a written record of all hospitality or gifts accepted or offered, both given to and received by you. The records will be subject to review by the ExCom.
- 9.3 You must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our applicable expenses policy, and specifically record the reason for the expenditure.
- 9.4 All accounts, invoices, and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments, and personal funds must not be used to accomplish what is otherwise prohibited by this Policy.

## 10. How to raise a concern

- 10.1 You are encouraged to raise concerns about any issue or suspicion of malpractice or violations of this Policy at the earliest possible stage.
- 10.2 If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager and/or the HR or legal department. Alternatively, if you are uncomfortable speaking with them, or concerned after doing so, you should use the other channels referred to in the DOMO Speaking-Up Policy, which is part of the Code of Conduct.

## 11. What to do if you are a victim of bribery or corruption

- 11.1 It is important that you tell your line manager and/or the ExCom as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

## 12. Protection

- 12.1 Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. As set out in the DOMO Speaking-Up Policy, which is part of the Code of Conduct, we encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.
- 12.2 We will not tolerate retaliation or detrimental treatment of any kind as a result of any Worker refusing to take part in bribery or corruption, or because he or she reports in good faith his or her suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Any Worker found to have retaliated against another Worker for refusing to take part in bribery or corruption or for reporting in good faith his or her suspicion that an actual or potential bribery or

other corruption offence has taken place or may take place in the future will be subject to appropriate discipline, up to and including termination of employment. Retaliation or detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should either inform the ExCom immediately.

### 13. Training and communication

- 13.1 Training on this Policy shall form part of the induction process for all new Workers. Comments, suggestions and queries should be addressed to the Chief Human Resources Officer.
- 13.2 Our zero tolerance approach to bribery and corruption will be communicated to suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

### 14. Monitoring and review

- 14.1 The ExCom will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.
- 14.2 The ExCom, through the Chief Executive Officer, will report to the DOMO Board on its monitoring of the Policy and any breaches of the Policy and submit to the Board any proposed amendments to the Policy.
- 14.4 All Workers are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.

## Schedule 9

# DATA PROTECTION AND PRIVACY POLICY

## Introduction

The basic principles of GDPR (i.e. the European General Data Protection Regulation of 27 April 2016 which entered into application on 25 May 2018), the personal data of our employees that we process and our general rules of conduct regarding data protection are set out in this Schedule.

Where there are more specific or deviating local privacy laws and regulations applicable in the country of your employment, this policy will be adapted to the local legal requirements and a copy of the locally applicable data protection policy will be provided to you.

This Schedule 9 only applies to our employees working in the European Union. For DOMO employees whose country of employment is outside the European Union, substantially similar data protection and privacy principles apply: any deviations or further specifications are set out in your locally applicable data protection policy.

As a company we attach a great deal of importance to the privacy of our customers, suppliers and business partners but also to the privacy of our own employees.

Considering the importance of this subject we have drawn up this document so that any employee would be informed of:

- the major principles in data protection (see part 1);
- the personal data that we process from him/her (see part 2);
- the way he/she is to handle the personal data of others in a correct and safe manner in the execution of his/her function within our company (see part 3).

## 1. BASIC PRINCIPLES IN DATA PROTECTION.

### 1.1 What are personal data?

Personal data are all the information relating to a natural person ("**the person concerned**") that directly or indirectly is or can be identified.

A few examples of personal data are: name, telephone number, photo, bank account number, etc. When it is possible to identify a natural person thanks to the combination of different information (such as: age, gender, diploma, marital status, town, salary, nationality, religious belief, health situation, etc.), such information is also considered as personal data.

In certain circumstances data can also be considered 'sensitive'. This is the case when the data relate to race or ethnical origin, political opinions, religious or philosophical beliefs, trade union membership, genetics, biometrics, health, sexual behavior and criminal convictions and facts. The collecting and processing of these data is prohibited in principle and/or is only exceptionally permitted under very strict conditions.

## 1.2 What is data processing?

“Data processing” is understood to mean: any form of handling the personal data, whether or not through automated procedures, such as collecting, recording, ordering, structuring, storing, updating or modifying, retrieving, consulting, using, transmitting, distributing, providing, combining, protecting, deleting or destroying.

## 1.3 When can personal data be processed?

Personal data cannot be processed just like that. The GDPR determines the conditions and circumstances under which the processing of personal data is authorized. Thus personal data cannot be processed unless there is a legal basis for the processing thereof, i.e. when:

- the person concerned has given his/her unambiguous, free and informed consent;
- the processing is necessary for the performance of an agreement that the person concerned has concluded or will conclude with the controller, for example your employment contract;
- the processing is necessary to fulfil an obligation that the data controller must comply with under a law, decree, ordinance, for example the obligation for the employer to communicate certain data of his personnel to the social security services;
- the processing is necessary to protect the vital interest of the person concerned, for example in case of an unconscious victim of an accident on whom medical data are to be collected in order to provide him/her first-aid care;
- the processing is necessary for the performance of a task carried out for reasons of public interest or within the scope of the exercise of official authority vested in the data controller;
- the data processing is necessary to safeguard a legitimate interest of the controller or any other person, if the interests or fundamental rights and freedoms of the person concerned do not override the above.

## 1.4 What rights do the persons concerned have?

### 1.4.1 Right to information

Personal data cannot be processed without the person concerned knowing it. The person concerned must in principle be informed in advance of the fact that his/her personal data will be processed, why and in what way.

### 1.4.2 Right of access

Every person has the right to know whether or not a specific company is processing some of his/her personal data. If a company is processing personal data then the person concerned has the right to access these data.

#### **1.4.3 Right to rectification**

Every person concerned has the right to

- a) have inaccurate personal data rectified or
- b) have incomplete data completed.

#### **1.4.4 Right to erasure (“right to be forgotten”)**

In a number of specific cases the person concerned is entitled to obtain the erasure of his/her personal data, for example when the personal data are no longer necessary in relation to the purposes for which they were collected or processed.

#### **1.4.5 Right to restriction of processing**

In specific cases the person concerned is entitled to obtain a restriction of the processing of his/her personal data, for example for a period enabling the controller to verify the accuracy of the personal data if the person concerned contests the accuracy of the processed data, or in case of unlawful processing when the person concerned opposes the erasure of the personal data and requests the restriction instead.

#### **1.4.6 Right to data portability**

The GDPR stipulates that in a number of cases a person concerned is entitled to receive in a structured, commonly used and machine-readable format the personal data that he/she has provided and transfer it to another processor, or to have it transferred directly from one processor to another processor.

#### **1.4.7 Right to object**

Under certain conditions the person concerned is entitled to object the processing of his/her personal data on grounds relating to his/her particular situation. This right however is not always applicable and is not an absolute right.

It is for example impossible to object in case of data processing that is necessary for the execution of an agreement, such as for example the processing of your personal data within the scope of your employment contract.

#### **1.4.8 Right not to be subject to automated individual decision-making**

Any person has the right not to be subject to a decision which produces legal effects concerning him or her or similarly significantly affects him or her, based solely on automated data processing including evaluating certain aspects of his/her personality (so-called “profiling”). This is not applicable when the decision is necessary for entering into or performing an agreement, for example a loan or an insurance contract, or if it’s required by law or a regulatory provision, or when the person concerned has given his/her explicit consent to that effect.

## **2. DATA PROTECTION WITH RESPECT TO OUR EMPLOYEES**

Below we have tried to present an overview as complete as possible of the personal data that we process about you and of the purposes of these processing activities, as well as our obligations and your rights in this respect.

In this context the DOMO legal entity that is your employer operates as controller of personal data as it will decide why and how your personal data will be collected and processed.

## 2.1 What personal data are collected and for what purpose?

### 2.1.1 Categories of personal data

The following personal data will be collected and processed by us, in principle as from the moment of your application until the moment of termination of your employment contract:

- Identification data (for example surname, first name, date and place of birth, national register number if legally required)
- (Electronic) contact details (for example address, telephone number, e-mail address, login data, badge number)
- Family situation (for example marital status, number of dependents)
- Physical characteristics (for example length and weight)
- Financial data and information (for example bank account number, salary, benefits, expenditures, salary calculation)
- Information regarding the training followed, previous jobs and language skills
- Information on evaluation and training (for example promotions and trainings followed)
- Information regarding the duration of employment (for example work plan, absences)
- Information on career (for example duration of career)
- Pictures and camera images

The personal data may nevertheless be kept for a longer duration as per applicable local statutes of limitation and/or as pursuant to any locally applicable data retention policy.

As the case may be, the above list will be adjusted and/or supplemented from time to time according to the actually collected and processed data.

### 2.1.2 Processing purposes

The personal data listed under 2.1.1 can be processed for the following purposes:

- Contacting the person concerned
- Recruiting
- Identification of the employee
- Performance of employment contract
- Human resources management
- Payment of salary
- Communication
- Division of tasks
- Pension administration
- Taxes and social security
- Access to the employer's systems
- Supervising the use of internet and e-mail at the workplace
- Transfer or take-over of (part of) the company
- Disciplinary sanctions

### **2.1.3 Legal basis**

The personal data listed under 2.1.1 are usually processed because it is necessary for the correct performance of the employment contract and/or because the law requires the processing of these data. When this is not the case, we have meticulously verified whether or not we have a legitimate interest for processing these personal data, taking into account your interests and reasonable expectations.

### **2.1.4 Direct / indirect acquisition**

In general we have received the abovementioned personal data directly from you, for example when you apply for a job with us. On the other hand we can also obtain some of your personal data indirectly, for example when we ourselves generate information on you, such as in case of an evaluation.

When we ask for additional information about you, we will specify whether this information is absolutely required and what the consequences are if you were not supplying these data.

## **2.2 With whom your personal data are shared?**

Your personal data will only be accessible to your superior and the HR managers of DOMO in the EEA. Some categories of personal data however are shared to specific categories of recipients, such as suppliers of IT services, social secretariats, insurances and financial institutions, only for the abovementioned purposes. We shall not supply these personal data to other third parties, except if we are obliged to do so pursuant to the law.

## **2.3 How are your personal data protected?**

We take the necessary administrative, technical and organizational measures to ensure the security and confidentiality of your personal data and we protect your personal data against destruction, loss, abuse, unlawful granting of unauthorized access, to the transmitted, stored or otherwise processed data, either accidentally or unlawfully, which more in particular can lead to physical, material or immaterial damage.

These measures take into account the state of technology, the implementation costs, as well as the nature, the size, the context and the processing purposes and also the probability and severity of the various risks for the rights and freedoms of natural persons that are related to the processing.

## **2.4 For how long are your personal data retained?**

Your personal data will be retained for as long as necessary for achieving the purpose for which they were collected and in line with the legal, regulatory and internal requirements in this respect.

## **2.5 Your rights**

If you have questions, wish to submit a request or execute your rights with respect to personal data as described in the first part of this privacy policy, you can always contact your local HR manager, your local Data Protection responsible or, once appointed, the DOMO Data Protection Officer. You also have the right to lodge a complaint with the competent data protection authority.

### 3. GENERAL RULES OF CONDUCT REGARDING DATA PROTECTION

#### 3.1 Responsibility regarding data protection.

The management determines the internal rules of conduct regarding data protection for superiors and employees and makes sure that the necessary technical and organizational measures are taken to guarantee data security.

In addition, an important task is reserved to every single employee getting into contact with personal data of applicants, other employees, customers, suppliers, business partners etc. on a nearly daily basis.

Therefore we urge you to observe the GDPR, labor regulations and internal rules of conduct in this respect at all times and to immediately report any infringements that you may suspect or notice to your superior.

#### 3.2 Rules of conduct regarding data protection

The general rules of conduct mentioned below are a first guideline for the correct and safe handling of personal data.

For each department/function additional special rules of conduct can be determined. These will be further specified per department/function.

- *Make sure each processing activity is realized in accordance with the GDPR.*  
When starting up a new process, product, service or other project where personal data would be processed, take into account the GDPR from the very start. The basic principles in processing personal data are the following:
  - lawfulness, fairness and transparency: personal data are to be processed in a lawful, fair and transparent manner with respect to the person concerned;
  - specific purpose: personal data are to be collected only for specific, expressly described and justified purposes and cannot be processed subsequently in a manner that would be incompatible with that;
  - minimisation: for achieving the projected purposes only the personal data that are absolutely necessary and required to that effect, can be processed;
  - correctness: the personal data that are processed, are to be correct and must always be kept up-to-date. Incorrect personal data are to be adjusted or removed;
  - storage restriction: the personal data are to be stored in a form that allows identification of the persons concerned only for the purposes for which they are necessary;
  - integrity and confidentiality: when processing personal data always appropriate technical or organizational measures are to be applicable in order to guarantee security and to make sure that they are protected against unjustified or unlawful processing and against loss, destruction or damaging.

- *Ensure transparency when processing personal data.*  
Individuals to whom the personal data relate to, always have to be informed of the processing of their personal data. In this respect you should refer to our external privacy policy where possible.
- *Ensure accessibility.*  
Always immediately notify your superior when you receive a question from an individual about the processing of his/her personal data, so that this question can be answered within the short period of time as provided by the GDPR.
- *Ensure the confidentiality of the personal data.*  
Restrict the access rights so that only the personal data that are necessary for the execution of a specific function will be accessible.
- *Ensure appropriate measures for the protection and security of the personal data.*  
It is of essential importance to take security measures in order to protect the personal data. To this effect our ICT department has implemented on the one hand organizational measures and on the other hand technical measures (e.g. back-up system). These measures are to be observed and complied with at all times.
- *Make sure to think before transmitting personal data outside the company.*  
When appealing to third parties that process the personal data for us, you are always to make sure that these third parties provide sufficient guarantees for the processing to be realized in accordance with the GDPR. Furthermore personal data cannot be shared with third parties outside the company that do not have concluded an appropriate agreement and extra measures are to be taken when personal data would leave the European Union.

Therefore always consult in advance with your superior if under the execution of your tasks you are to share personal data with third parties, whether or not outside the European Union, especially if it is a third party to whom you have never transmitted personal data before.

### **3.3 Contact**

Should you have any further questions, comments or proposals on this subject, please do not hesitate to contact your local HR manager, your local Data Protection responsible or, once appointed, the DOMO Data Protection Officer.



*The Code of Conduct is a fundamental part of the terms of employment for all employees of DOMO Chemicals companies.*

*All employees receive the Code when they join the Group and are held accountable to its contents. It is available in 8 languages and has been adopted by local boards.*

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## **FIND OUT MORE:**



For employees



For external users



## **DOMO CHEMICALS**

DOMO Chemicals is a leading engineering materials company and highly integrated solution provider committed to the sustainable future of polyamides.

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is our formula

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