



Code of Conduct

January 1

2025

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WSF Ethical
code of
conduct

1. Scope and objectives

- I.1. Compliance means the observance of all voluntary, supervisory, and legally prescribed measures designed to ensure that the business activities of the Warrior Squad Foundation (WSF) and its employees are conducted in a manner that complies with the law.
- I.2. Compliance serves as a trust-building measure to protect the reputation of the Warrior Squad Foundation (WSF) and its employees around the world. It should be considered a guiding principle within the Blue Spirit concept which forms part of WSF's social policy.
- I.3. This Code of Conduct summarizes the most important principles and standards of the Warrior Squad Foundation (WSF). All employees must be familiar with these. It also outlines the fundamental ethical and legal duties of WSF's employees.
- I.4. The Code of Conduct applies to all organizational units at WSF as well as subsidiaries and associated companies in which WSF has a direct or indirect stake of more than 50 percent. The scope of this Code of Conduct includes all company guidelines published on the Intranet under Company/Corporate Centre and by the departments listed there under. Supervisors are responsible for ensuring that their employees are informed of the company guidelines that are relevant to their jobs.

2. Business Conduct

2.1. Managing business transactions Observance of all laws and regulations

Since WSF operates nationally, it is required to comply with numerous national and national laws and regulations. All business activities and processes must therefore be conducted in accordance with all applicable laws, voluntary obligations, and binding regulations relating to WSF activities.

All employees are required to observe all applicable laws and other relevant guidelines and agreements. They are not permitted to issue instructions that depart from these principles and result in violation of the stated corporate policy on the conduct of business activities.

Preventive legal counsel

It is essential to avoid risks and to obtain legal counsel before taking any action that could lead to a violation of applicable laws and guidelines.

Bribery

WSF prohibits any form of bribery or attempted bribery by offering or accepting money or valuables.

Gifts and offers of entertainment and other privileges

The following principles must be observed when dealing with business partners and governmental institutions.

Gifts, favors, hospitality, and other privileges may only be offered or accepted if they do not exceed the bounds of typical business practice in their Levant region, are not of an inappropriately high value, and are not considered or could be construed to be a bribe, do not violate applicable laws and/or the ethical principles applicable in the Warrior Squad Foundation (WSF), could not place the WSF or employee in an embarrassing situation should the public become aware of them. In case of doubt, employees must obtain the approval of their supervisor or compliance officer.

Use of WSF property and resources

Using WSF resources for personal interests is prohibited. Exceptions to this rule require prior authorization. Corporate guidelines must be observed, especially with regard to the use of telephones, computers, (e.g., the installation of extraneous software), the Internet, and e-mail.

Integrity in reporting

All financial reports, accounting documents, research reports, sales reports, expense receipts and documentation, environmental and safety reports, and other corporate documents must provide a clear, timely, and accurate reflection of the relevant facts and/or the nature of the transaction. Violation of accounting and financial reporting rules, balance sheet offenses, and improper documentation will not be tolerated.

It is the responsibility of all relevant employees, with the involvement of departments responsible for financial statements and auditing, to cooperate fully with the WSF's auditors and not to withhold any necessary information from them.

It is the stated policy of the Warrior Squad Foundation (WSF) to ensure that information and documents furnished to government and administrative authorities and to stakeholders and the general public are truthful.

External communication

Official statements, especially statements to the media, may only be made by personnel expressly authorized to give such statements.

2.1 Business relations

Equal treatment and fair practice

Every employee is required to take personal responsibility for honest, equal, and fair treatment of all business partners. A process based on objective and comprehensible criteria must be used to select suppliers and service providers. This must take account of the fact that business partners are expected to meet requirements comparable to the principles contained in this Code of Conduct. Wherever possible, several offers must be obtained before awarding contracts.

Business Incentives

Typical business incentives comprise commission payments, rebates, discounts, free shipment of goods, and similar incentives.

Such incentives should be used with great care to ensure compliance with relevant statutory regulations. Full and accurate records must be kept of the use of business incentives.

Payments

Payment for goods and services received through a company that is part of the Warrior Squad Foundation (WSF) must be made immediately to the contractual partner. Payment is usually made in the country where the counterfactual's business is headquartered. Complete or partial payment in cash is prohibited, except where the sums involved are negligible. The appropriated legal counsel must be consulted before making divergent payment arrangements.

2.2 Conflictsofinterest

2.3.1. Secondary

employment

An employee may only take up a second job after obtaining permission from the appropriate personnel department.

2.3.2. Substantial financial interests in competitors, customers and suppliers

Substantial financial interests in a competitor, customer, or supplier must be authorized by the employee's supervisor. Substantial financial interests held by close relatives in a competitor, customer, or supplier must be reported to the compliance officer if this involves a potential conflict of interest for the employee. A substantial financial interest is defined as a shareholding of 5 percent or more.

2.3.3. Contracts/ business transactions with relatives of WSF employees

Business transactions may not normally be undertaken with relatives of WSF employees. Certain transactions may, however, be permitted by the employee's supervisor or WSF's or the WSF's supervisory committee. In such cases, it must be ensured that the employee in question is not involved in the decision. Close relatives include spouses, parents, children, and other relatives and partners who live in the same household as the employee.

2.3 Insider trading

- 2.4.1. Some national laws forbid the use of information that is not meant for the public and/ or information that has not yet been made public in connection with the purchase or sale of securities.
- 2.4.2. This Code of Conduct also prohibits the use of insider information gained as a result of employment by the Warrior Squad Foundation (WSF) (including information about business partners) either for an employee's own personal gain or the benefit of a third party.

2.4 Maintaining the confidentiality of internal information

- 2.5.1. All information that has not been made available to the public is subject to secrecy and may not be disclosed to unauthorized third parties either during the employee's term of employment or thereafter.
- 2.5.2. The direct or indirect use of confidential business information during the term of employment or thereafter for personal gain or the benefit of a third party or to the disadvantage of Warrior Squad Foundation (WSF) is prohibited. WSF's employees are required to actively prevent confidential data from falling into the hands of third parties in compliance with the existing guidelines.

2.5 Political involvement and contributions

- 2.6.1. The approval of the Board of Management of WSF must be obtained before making contributions to political parties, organizations closely associated with political parties, political candidates, or people holding government offices either out of WSF funds or assets or through the provision of services. Other donations may only be made out of an authorized budget. Such budgets and donations must be reported to the appropriate supervisory

committee.

- 2.6.2. Employees may not be urged either directly or indirectly to provide money for party contributions or to support a political party or a person standing for a political office. Holding events for political parties and other political activities on RRI property is prohibited RRI-wide. Employees who hold political offices must report these to the compliance officer if they are likely to attract media attention.

2.6 Ethics.

- 2.7.1. In all business activities, WSF employees must respect the national and cultural differences and rights of all individuals with whom they come into contact. It is the stated objective of WSF not to discriminate against any employee, prospective employee, or business partner on the basis of age, race, religion, skin color, gender, disability, national origin, descent, marital status, or sexual orientation. WSF will not tolerate any form of harassment-either toward employees or toward business partners.
- 2.7.2. Although patterns of behavior and business practices that conflict with this Code of Conduct are tolerated in some countries, we expect all WSF employees to exercise the utmost professionalism and integrity and observe WSF's corporate principles and guidelines.

3. Technical issues

3.1. Competition and antitrust law

- 3.1.1. It is a fundamental principle of the company's corporate policy that all WSF personnel shall conduct business in accordance with the relevant competition law.
- 3.1.2. In general, the applicable competition and antitrust laws in countries in which WSF does business prohibit agreements and activities that can hinder trade or competition. Violation of these laws includes, for instance, entering into agreements with competitors in order to fix or control prices, boycott particular suppliers or customers, divide up customers or markets, or limit the production or sale of products.
- 3.1.3. Special care must be taken to ensure that activities undertaken with representatives of other companies cannot be considered or interpreted as violating competition law.
- 3.1.4. Violation of competition law can result in substantial fines and claims for compensation and damage to the WSF's image. This can damage the Foundation and its market position. Further, failure to comply with antitrust regulations may lead to claims for compensation against the personnel involved and/or imprisonment.

3.2. Foreign trade, export, and terrorism controls

- 3.2.1. WSF observes all national, multinational, and supranational foreign trade regulations. These include customs regulations and trade and production controls.
- 3.2.2. All WSF employees are required to observe the legal regulations and WSF's corporate policy guidelines on internal export controls.
- 3.2.3. When assessing unlisted dual-use goods (goods that can serve both civilian and military purposes), the decisive fact is how such goods will be used by the customer, not the goods themselves. If there is any uncertainty about the use of such goods, WSF will refrain from

shipping them.

- 3.2.4.** WSF fully supports all efforts by the international community to prevent the manufacture and proliferation of chemical, biological, and nuclear weapons, including launch systems, and to stop international terrorism. To achieve this goal, a number of national and multinational export control regulations are observed. These limit and or even prohibit the export and/or re-export of specific goods, technologies, and services to certain countries, organizations, and people.

3.3. Tax law

WSF observes all applicable tax laws and regulations.

- 3.3.1.** Transfer prices are set based on recognized OECD principles, in other words on the same terms as dealing at arm's length.
- 3.3.2.** Employees working on international assignments must give an undertaking that they will observe the relevant personal tax obligations in line with the WSF transfer guidelines.
- 3.3.3.** Employees may not support requests from business partners for action that reduces their tax liability.

3.4. Environmental protection, safety, occupational health, and quality

Environmental protection, occupational health and safety, and quality are essential for the continued development of WSF, the creation of corporate value, the protection of the health of employees and their quality of life, and securing the necessities of life in the long term.

WSF is committed to sustainable development and the chemical industry's worldwide Responsible Care initiative. To implement these principles, the uniform standards set out in the WSF requirements must be observed. These are mandatory throughout the Warrior Squad Foundation (WSF).

3.5. Data protection

- At WSF, the conscientious handling of personnel-related data has always been considered a key value out of the respect for the privacy of fellow human beings.
- The right of employees and business partners to determine what personal information they make available must always be protected.
- Unauthorized collection, use, or distribution of personal data on employees and business partners is forbidden. In addition, the corporate guidelines on data protection must be observed.

3.6. IT security

Extensive use of IT systems means that WSF's business activities are dependent to a larger extent on the functioning and availability of such systems. It is no longer possible to imagine conducting business without information technology.

The risks that arise from this dependency are increased by the risk of loss, theft, and unnoticed alteration of information. For details on how to limit these general risks, the risks of technical failure, and the risks arising from the incorrect conduct of personnel, please see the corporate guidelines on IT security.

4. Beneficiary Safety and Protection

4.1. Sexual Exploitation and Abuse

All WSF employees have the responsibility and obligation to treat children, families, and communities with dignity and respect and to ensure their safety and protection. Our guidelines comply with the core principles of the humanitarian assistance established by the Inter-Agency Standing Committee (IASC) and all include the following.

1. Sexual exploitation and abuse by WSF workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior is prohibited. This includes the exchange of assistance that is due to beneficiaries.
4. Sexual relationships between humanitarian workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. WSF workers are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.

4.2. Child Protection Policy

WSF enforces a zero-tolerance policy on violence, exploitation, and abuse of children. For our standards, we include recognized values and guidelines, among others the United Nations Convention on the Rights of the Children. Therefore:

1. We ensure that human and child rights are being guaranteed at all times.
2. We obligate to strengthen the rights of children and protect them from sexual, emotional, or physical abuse, exploitation, and neglect.
3. We create an environment that is safe for children and other vulnerable groups.
4. We integrate the special interests, needs, and requirements of children in the planning of our projects and activities.
5. We are aware of the importance and adherence to the rights and needs of children during our projects and through media campaigns.
6. We ensure that the dignity of the child is constantly maintained; including in the field of presswork and public relations.
7. We have defined responsibilities and procedures for prevention, crisis management, and monitoring.
8. We contribute towards the elimination of child labor.
9. We are in force community efforts to protect and fulfill children's rights.

5. Practical implementation of compliance rules

5.1. Responsibilities

The compliance officer (Head of the WSF-Investigation Office) is responsible for ensuring WSF implementation of compliance rules. This includes ensuring independent and objective treatment of

issues drawn to the attention of the compliance officer.

The compliance officer is a direct contact for all employees requiring information or advice on compliance rules. Staff working for the compliance officers are sworn to absolute secrecy. Contacting the compliance officer will not have any negative implications for employees.

The compliance officer takes note of all information submitted and looks into it with due attention. All information is treated as strictly confidential. If the compliance officer decides that there is enough initial evidence to suspect a violation of the principles contained in the compliance rules, he/she may consult the corporate departments, e.g., Corporate Audit, to clarify the matter, without, however, jeopardizing the confidentiality of the information received.

5.2. Protection against retaliation

It is the duty of staff members to report any breach of the Organization's regulations and rules to the officials whose responsibility it is to take appropriate action. An individual who makes such a report in good faith has the right to be protected against retaliation. Retaliation against individuals who have reported misconduct or who have cooperated with audits or investigations violates the fundamental obligation of all staff members to uphold the highest standards of efficiency, competence, and integrity and to discharge their functions and regulate their conduct in the best interests of the Organization in view.

Retaliation means any direct or indirect detrimental action recommended, threatened, or taken because an individual engaged in an activity protected by the present policy. When established, retaliation is by itself misconduct.

Individuals who believe that retaliatory action has been taken against them because they have reported misconduct or cooperated with a duly authorized audit or investigation should forward all information and documentation available to them to support their complaint to the Investigation Office as soon as possible.

5.3. Responsibility of supervisors for information and control

All supervisors must make sure that their employees are informed of the contents of the Code of Conduct. Supervisors must set an example by implementing these standards. Furthermore, as part of their responsibilities, they must make sure that their employees observe these guidelines.

5.4. Responsibility of employees to report failure to observe these guidelines

All WSF employees are required to inform their supervisor(s) or the compliance officer if they become aware of any violations of this Code of Conduct.

5.5. Sanctions and consequences

Violating the Code of Conduct can lead to disciplinary action and is punishable in accordance with the usual WSF rules.

5.6. Commitment of all employees

A copy of the Code of Conduct must be handed to every employee.

All employees must sign a compliance letter stating that they understand the behaviour described in

the Code of Conduct and will not engage in prohibited activities. A signed copy of the compliance letter is an essential part of each employee's personal file.

5.7. Training

Employees throughout WSF will receive regular information on current compliance issues.

Special training will be provided for relevant target groups on issues such as export and terrorism control, antitrust and competition law, the environment, safety, and health. Attendance may be mandatory. Records will be kept of attendance at such training sessions.

6. Acknowledgment

I have read the foregoing **Code of Conduct** of Warrior Squad Foundation and do agree to comply with the statements contained therein.

Signature Employee

Date

Signature Witness

Date