TROX WHISTLEBLOWER SYSTEM

To preserve the integrity of TROX and be able to avert possible damage, TROX would like to hear about compliance violations. For this reason, we have set up a whistleblower system.

It should be used if you feel it is not possible to go to your supervisor, the compliance department or directly to the Board of Management.

Our customers, suppliers and other business partners can also provide information should they discover any fraudulent activities or actions that could prove harmful to the company. Such information can be submitted via the portal from anywhere in the world.

Please use the whistleblower system responsibly. It is essential that whistleblowers only pass on information that they are certain is correct. The portal may not be used for the deliberate submission of false or defamatory claims or information.

LOOK OUT. TALK TO US.

The whistleblower system is available in seven languages and can be used anonymously if desired to report potential violations of our value culture and suspected criminal cases.

As TROX strives to maintain a policy of open communication, we would encourage you to give your name if you have any information. In any case, the compliance department will treat your concerns with the strictest confidence and take into account the legitimate interests of all parties involved.

An electronic mailbox has been set up to enable communication between whistleblowers and the compliance department – on an anonymous basis if desired. This is important should you have any questions or should you want to add more information to your report later.

We in the Board of Management of TROX GmbH would like to thank you for your trust and for your support in our efforts to embody our motto "People are the benchmark and their well-being is our goal".

TROX BUSINESS CODE OF CONDUCT

FOR COLLEAGUES, SUPPLIERS AND STAKEHOLDERS.

We, at the TROX GROUP, can convince with price, performance, quality and suitability of the offered high-quality products as well as with effective consulting. Therefore, one of the key factors for the success of the TROX GROUP is fair and correct dealings with each other, with our customers, our suppliers and other business partners in accordance with laws and regulations as well as ethical principles.

To assure obeying of these principles throughout the national and international commercial life of the TROX GROUP, a Compliance Management System (CMS) was introduced by the management and the supervisory board. TROX Corporate Audit and Compliance is responsible for the worldwide implementation of the system. Offences should be avoided as far as possible by the introduction of processes to regulate benefits and a proper business partner review as well as through regular trainings and audits on site.

The underlying message is: We refrain from business that can only be generated by breaking laws or disregarding our regulations.

ANY FURTHER QUESTIONS?

TALK TO ME.

Karl-Heinz Klosterberg

Revision und Compliance

Tel: +49 (0) 2845 202-245

Mobile: +49 (0) 172 8012160

Mail: karl-heinz.klosterberg@troxgroup.com