



Corporate policy



Grillo Group
2021

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1. Introduction

The Grillo Group, with its headquarters in Duisburg, is divided into the four business areas of chemistry, metal, RHEINZINK and zinc oxide. The following comprehensive corporate policy is defined for all production sites and subsidiaries in Germany (Duisburg, Industriepark Frankfurt-Höchst, Datteln and Goslar).

The Grillo Group is committed to sustainability as a key component in its corporate strategy. The Group regards itself as an innovation driver and explicitly incorporates all three dimensions of sustainability: economic success, social responsibility and the protection of people and the environment.

We expressly support the ten United Nations (UN) Global Compact Principles in the areas of human rights, labour standards, environmental protection and combating corruption, including their consideration in business processes, and the Charter of Fundamental Rights of the European Union.

The chemical and metal industry are key industries in Germany. With the "Responsible Care" and "Chemie³" initiatives, they make a significant contribution to the sustainable development in the framework of the UN's Sustainable Development Goals by providing momentum to policies and communities.

The tension between the threats of climate change and competitive energy costs is highly relevant for us. Securing the future means more than ever: Using energy efficiently. Conserving energy and sourcing it at competitive prices are key prerequisites for our economic success. Additionally, we feel it is our duty to preserve our natural environment and we are committed to the principles of sustainable action.

Our goal is to protect people, animals and plants, soil, water and the atmosphere, as well as cultural and other protected objects, from harmful environmental impacts caused by the operation of our production facilities, regardless of legal requirements, and to prevent harmful environmental effects from being generated. The safety of people and equipment, environmental

protection and economic efficiency are equally important corporate goals. Every company employee, at every level, is encouraged to pursue these corporate goals.

The present and future needs of the market determine the quality of our products and services. We consider the market and its changes as an opportunity and thus focus on our customer's requirements and goals. We are committed to customer satisfaction through the high quality of our products and services.

The Grillo Group companies have established management systems in which the systematic pursuit of the corporate policy is ensured through analysis, evaluation and the definition of goals and measures.

The management board, the managing directors and the business unit managers are responsible for implementing, maintaining, further developing (continuous improvement) and the effectiveness of the management systems and are accountable to the management systems.

We generally welcome the currently discussed extended reporting requirements within the framework of the EU Green Deal, national CSR guidelines and private-law associations and are actively preparing for them.

2. Sustainability

Economic efficiency

As a family-owned business founded in 1842, we are committed to sustainability. This includes a level of profitability that allows for a satisfactory return on capital and for continuous investments, thus creating an orientation towards the future and the necessary resilience to crises.

It is our goal to secure the company's economic success in the long term. Through our activities, we contribute to preserving our jobs. We are committed to the principles of sustainable business and environmental protection in our activities. Our goal is to strengthen the communities in which we operate while reducing negative impacts on society.

Human rights / equal opportunities

The Grillo Group respects and supports compliance with internationally recognised human rights and the strict rejection of all types of child labour and forced labour. We maintain equal opportunities of all employees regardless of skin colour, race, gender identity, age, nationality, social background, disability and sexual orientation. We respect the political or religious convictions of our employees if they are based on democratic principles and tolerate those of different persuasions. All employees of the Grillo Group enjoy full freedom of association and the right to collective bargaining.

The employer and the works council jointly work for the benefit of the employees and the company in compliance with the applicable collective agreements and in cooperation with the respective trade unions and employee associations. The works council will be informed of significant operational changes. The measures to be adopted are discussed jointly. The works council is involved in all matters relating to working conditions within the framework of the Works Constitution Act. Occupational safety and health issues for all employees of the Grillo Group are discussed with the works council.



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For us, disabled persons are equal members of society and business life. Their promotion and integration into the company as well as respectful cooperation are key principles of our corporate culture.

We respect all intellectual property rights. Technology transfer and the transfer of know-how take place in such a way that intellectual property rights are protected.



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Our employee suggestion system promotes entrepreneurial and cross-departmental thinking and action. Every employee should suggest new ideas and alternative solutions for our production processes for increasing competitiveness, improving working conditions, internal processes and procedures, environmental protection and occupational health and safety, and similar topics, and in this way contribute to the success of the company.

¹ Photo: Krakenimages, Unsplash

² Photo: Bill Oxford, Unsplash

Privacy protection in processing personal data and the security of all business data are important for us, which we take into account in our business processes.

Health and safety at work

We are committed to preventing work-related accidents, injuries and illnesses and to protecting our employees and contractors. Our goal is zero accidents. Achieving this is at the heart of all we do. We actively pursue preventive occupational health and safety. All supervisors are required to raise employee awareness of safe behaviour. All employees are encouraged to report unsafe situations (near accidents).

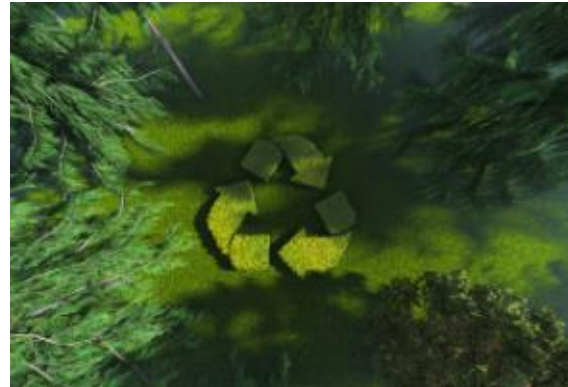


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For occupational health and safety, works agreements have been concluded between the employer and the works council at all locations and in all business areas of the Grillo Group, which not only establish the rights and obligations of these parties, but also formulate binding standards for all employees of a company.

Environmental sustainability

We are committed to environmentally friendly production methods. We strive for efficient use of natural resources at all stages of the product life cycle, giving preference to the use of sustainably managed, renewable resources and low-waste production.



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Our intention is to maximise our resource efficiency and promote circular economy approaches. Natural ecosystems must be preserved and protected. Therefore, we support the goals of the UN Convention on Biological Diversity. We review our environmental and energy targets annually and adjust the goals and measures for the following year.

Energy efficiency

Given the increasing importance, the Grillo Group is committed to reducing its CO₂ footprint in the long term and to improving energy efficiency in a continuous process for economic efficiency and environmental protection reasons.

Our strategic objective is to use our energy management system for a systematic, holistic and long-term reduction of specific energy consumption within the company, and to reduce the energy-related environmental impact while meeting customer requirements. The energy policy is an integral part of our corporate strategy.

³ Photo: Hush Naidoo, Unsplash

⁴ Photo: Vokri, Getty Images



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We are committed to regularly assessing our energy consumption and continuously improving our energy performance.

We take into account the improvement of energy performance when designing and procuring new facilities, equipment, systems and energy-using processes and services that have a significant impact on our energy performance. We also consider this when making changes to existing facilities, equipment, systems and energy-using processes and services that have a significant impact on our energy performance.

The management and all employees are committed to implementing the requirements of the energy management system. The necessary resources are made available for this.

Climate protection and climate neutrality

The Grillo Group supports the chemical industry's Responsible Care initiative and is committed to the need to reduce fossil energy use and greenhouse gas emissions. Within the scope of its corporate activities, the Grillo Group intends to make its contribution to climate protection and supports the goal of the European Commission's Green Deal to create a climate-neutral Europe by the year 2050.



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We focus on a safe and environmentally friendly, but at the same time economical transportation of our products. The objectives of the environmental programmes include reducing transport-related CO₂ emissions and optimising the transport chains to the customer. Basically, the following applies: ship before rail before road.

Nature conservation and biodiversity

We ensure that the impact on nature and biodiversity are reviewed in the event of site expansions, and that compensatory measures are implemented in cooperation with the authorities.

Social commitment

We maintain open communication with customers, partners, employees, neighbours and citizens and we actively cooperate with authorities and organisations. We carefully register all incoming complaints and follow up on them. If complaints are due to adverse effects caused by us, we take remedial action within the scope of our possibilities. The Grillo Group generally takes an active role in shaping standards, laws and guidelines relating to the manufacture and use of our products, which is why the Grillo Group and its subdivisions are involved as members in numerous sector relevant organisations and associations at international, national and regional level, and support external initiatives.

⁵ Photo: Jason Blackeye, Unsplash

⁶ Photo: Noah Buscher, Unsplash

Compliance with legal requirements

Within the scope of our activities, we are committed to complying with all existing laws and regulations as well as other legal requirements. The legal regulations and regulatory requirements represent minimum requirements for us. Our goal is to achieve better standards in all processes and services. This requirement is therefore integrated into the decision-making and organisational structure of our entire management system.



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Information security

Information security regarding confidentiality, integrity and availability is paramount for our customers - and thus also for us. When processing data and information, we always comply with all relevant, contractual and internal regulations. This applies to personal and especially highly confidential data and information. We regularly educate employees on information security and data protection requirements. We implement the authorisation and access concept, according to which employees only receive the authorisations they need for their work.

Education and training

We see the skills and commitment of our employees as the basis of our success and promote further education of our employees. For future staffing needs which will increase in the coming years due to demographic factors, we recruit from our own junior staff when possible and thus realise sustainable human resources work. Young people

are trained in recognised apprenticeship programmes at all locations.

The employees' sense of responsibility regarding occupational health and safety, health protection, environmental protection and energy efficiency as well as the quality of their work is promoted at all levels. Employees are encouraged to constantly contribute to the improvement of products and processes, environmental protection, energy efficiency and working conditions.



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Depending on the respective function and position, various development measures are available to all employees. We support lifelong learning through specific initiatives. Thus, the company ensures needs-based training that supports the strategic goals of human resources work and further develops the personal expertise and skills of all employees.

3. Occupational safety and plant safety

Occupational safety, the improvement of plant safety and incident management are a special focus of the Grillo Group. The following rules form the foundation of our occupational health and safety:

We provide our employees with a working environment in which accident and health hazards are minimised based on current risk assessments and measures to minimize risks as well as the design of production processes.

⁷ Photo: NicoElNino, Getty Images

⁸ Photo: Scott Graham, Unsplash



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We provide occupational medical care and a company medical centre to maintain the health of our employees.

We are committed to the continuous improvement of occupational health and safety and health protection. We do everything we can to identify potential hazards and risks for our employees and business partners as early as possible and counteract them with decisive action.

We raise awareness of the need to observe and ensure order and cleanliness at work, to report or independently remedy identified deficiencies as far as possible, to check and use all work equipment for its intended purpose before each use by visually inspecting it for safe condition and suitability, and to address and/or report behaviour that is contrary to safety.

Plant safety

We want to prevent environmental damage in all operating conditions and - as far as economically justifiable - we use the best available technology.



We raise awareness to comply with all safety precautions and ensure the correct handling of equipment, tools, materials and hazardous substances for their intended uses. The prevention of accidents and incidents by observing and improving occupational and plant safety is the task and obligation of all employees at all organisational levels.

Safety concepts are updated regularly and instructions in the event of an alarm are optimised.

Through maintenance, servicing and regular equipment inspections, we ensure not only a high level of process equipment availability but also a safe working environment.

Should a damaging event occur despite all precautions, care is taken to keep the impact as low as possible.

Our goal is to strive for continuous improvement of our companies in the areas of environment, facilities and occupational health and safety beyond legal requirements.

4. Quality

Our customer's expectations and requirements have priority. Every employee is obligated to ensure that customer requirements are met to the best of his or her ability. The customer's opinion about our products and services is essential. Only if we continuously improve our costs, quality and service will the customer give us preference.

Our aim is to ensure that every service produced in the company - at every workplace, in every function - meets the highest quality requirements and is geared towards continuous optimisation in the sense of continuous improvement (CIP). To do this, specific goals and key performance indicators are set and monitored at appropriate intervals.

It is our permanent objective to provide products and services free of defects. Error prevention has priority over mere error elimination. If errors occur, their causes must be eliminated.



In the areas where it is necessary, we guarantee comprehensive product, food and feed safety, and are aware of our responsibility as part of the food and feed chain. We are committed to complying with halal and kosher requirements in the manufacture of our products.

5. Compliance

The Grillo Group is committed to lawful conduct, fair competition and compliance with high ethical standards. As a traditional company, we rely on our good reputation in the market, the commitment of our employees and the quality of our products, not on unfair or illegal practices.



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The Grillo Group has drawn up the "GRILLO GROUP COMPLIANCE GUIDELINES" for all board members and employees worldwide. The guideline focuses on: Avoiding violations of antitrust laws, avoidance of corruption, preservation of confidentiality and avoiding conflicts of interest, and sets basic rules for on-site investigations by authorities.

6. Continuous improvement

We are committed to continuously improve the protection of human health and the environment as well as the safety of employees and fellow citizens, which we see as our own responsibility.

We work systematically and continuously on measurable improvements in the areas of quality, health protection, occupational health and safety, plant safety, environmental protection, climate protection, energy efficiency and product safety. Our goal is to continuously minimise the use of materials and energy as well as our impact on the environment. Therefore, we promote circular economy approaches.

These aspects are considered in the planning and procurement phase of new activities, processes and products. As far as reasonable, the best available technology is used.

7. Supplier relationship

We expect honesty, integrity and fairness from our suppliers, intermediaries, subcontractors and their employees, as well as compliance with our non-negotiable standards.

Suppliers and service providers are not selected solely based on economic criteria. Environmental protection, occupational health and safety and social standards are also part of the evaluation of new and existing supplier relationships.

The legal requirements for responsible procurement are binding for all procurements of the Grillo Group. Of particular importance for responsible and sustainable procurement is compliance with basic values in the areas of human rights, labour standards, occupational health and safety, environmental protection, energy efficiency and combating corruption.

¹⁰ Photo: Ilkercelek, Getty Images



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Our code of conduct for suppliers, intermediaries, subcontractors and their employees is valid for all locations and business areas (including all subsidiaries) of the Grillo Group.

The Management Board



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¹¹ Image: Cytonn Photography