

Corporate & Social Responsibility Policy

1. Social responsibility

1.1 Responsibility for the reputation of the company

Nexchem complies with all respective applicable laws at local, national, and international level.

Nexchem is aware of and considers its responsibility towards society without exception, in all its business activities and social commitments.

1.2 Responsibility for basic social rights

Nexchem recognises international human rights and supports their compliance.

1.2.1 Equal opportunities and non-discrimination

Nexchem is in favour of the International Labour Organisation, which include the right to form associations, the right to collective negotiations, the abolition of forced labour and child labour and a ban on discrimination in employment and careers.

Nexchem meets the principles of equal opportunities in the recruitment and promotion of employees. All employees are given equal treatment irrespective of nationality, gender, ideology, religion, disability, and other personal characteristics.

Nexchem does not tolerate discrimination in any form in the workplace.

1.2.2 Mutual respect

Every Nexchem employee must be treated fairly and respectfully. Every employee shall be respectful and open towards colleagues and undertake to avoid any type of discrimination and foster relationships that are based on mutual respect.

There is a zero-tolerance policy regarding violence in the workplace, threatening behaviour, intimidation, physical attacks, and any form of sexual harassment.

1.3 Leadership and management responsibility

Managers will lead by example and take steps to ensure that all employees follow this code of conduct emphasise that non-adherence will not be tolerated and ensure compliance with statutory rules and internal guidelines.

1.4 Sustainability

Nexchem believes in the principles of sustainability and sees them as core elements of good corporate governance. Where possible account will be taken of economic, ecological, and social aspects of our activities.

2. Co-operation with Business partners and third parties

2.1 Fair competition

Competition and anti-trust laws ensure fair and genuine competition. In its business transactions Nexchem constantly observes and complies with these laws. Every employee is obliged to adhere to the rules of fair competition. In addition, the anti-trust rules set out in the corporate guidelines must be observed.

No Nexchem employee is allowed to enter an arrangement with competitors that leads to the fixing or co-ordination of prices, conditions, capacities, the allocation of customers and markets. This also includes informal talks or jointly agreed ways of conduct that are aimed at or lead to restriction of competition. No agreements with suppliers and distributors that may be considered illegal will be entered into.

2.2 Anti-corruption

In a competitive environment Nexchem relies on the quality and value of its products and services and, in addition, chooses its business partners exclusively based on competitive criteria, e.g., price, quality and performance. Through clear guidelines, business processes and internal controls Nexchem supports national and international efforts aimed at ensuring that competition is not undermined by corruption.

2.2.1 Benefits for officials

It is not permitted to offer any kind of benefit or invitation to officials, civil servants, politicians and other employees and representatives of public institutions if such actions could put at risk the independence or integrity of these persons.

2.2.2 Offering and granting benefits

It is not permitted, in connection with business transactions, to grant benefits of any kind to business partners and employees of other companies with the aim of obtaining orders or unfair advantage for Nexchem. Handing out advertising gifts of little value or inviting people, within reason, to meals or events is generally permitted if the applicable laws and internal guidelines are adhered to and the possibility of influencing a business decision is excluded from the start.

2.2.3 Demanding and accepting benefits

No Nexchem employee is allowed to use their position or function at work to demand, accept, procure, or make others promise personal benefits for themselves or any other third party. Accepting advertising gifts of little value or invitations from people, within reason, to meals or events is generally permitted if the applicable laws and internal guidelines are adhered to and the possibility of influencing a business decision is excluded from the start. Any gifts and other benefits that exceed that limit must, on principle be declined.

2.3 Expectations of business partners

Nexchem expects its business partners to comply with the principles set out in this code of conduct. To do business with Nexchem our business partners must comply with the following principles:

Adhere to all applicable laws

Abstain from corruption

Observe the human rights of their employees

Abstain from using forced and child labour

Assume responsibility for the health and safety of their employees

Guarantee these values in their own supply chain

2.4 Trade Control Regulations

All Nexchem employees who are involved in the importation and exportation of goods and services are obliged to comply with all applicable rules relating to economic sanctions, export and import laws and regulations as well as all control regulations that apply to their business transactions.

3.0 Avoidance of conflicts of interest

3.1 Conflicts of interest

Every Nexchem employee is obliged to make business decisions in the best interest of the company, to separate private interests from company interests and to always remain loyal to Nexchem. Any type of conflict of interest is to be avoided and, in cases of doubt, the Managing Director must be informed.

The following are examples of where conflicts of interest may arise:

The private interests of a Nexchem employee differ from those of Nexchem Ltd.

A Nexchem employee acting on behalf of Nexchem concludes contracts with close relatives.

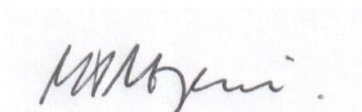
A Nexchem employee works in any capacity for suppliers, customers, or a competitor of the company.

3.2 Non-competition

No Nexchem employee is allowed to run a company or work for a company as an employee, consultant or in any other capacity which, in part or in its entirety, is a direct or indirect competitor of Nexchem.

3.3 Involvement in other companies

Nexchem employees must not involve themselves either directly or indirectly (e.g., via family members) in companies that have a business relationship with Nexchem if such an involvement gives or could give rise to a potential conflict of interests or loyalties.



Signed:

Date: 02/09/2020

Mark Major
Managing Director