

Benbros Enterprises LLC

Our commitment to conduct all our business to the highest degree of ethics, reliability, and transparency as well as with social responsibility, occupational safety, and environmental protections in mind.

Based on our values and relevant regulations, Benbros' Code of Business Conduct describes the principles for our operations and is designed to promote lawful, ethical as well as responsible behavior.

Any breach of the law or internal policies by our employees, no matter how minor or seemingly insignificant, could seriously harm Benbros' reputation and business, including substantial financial penalties.

In addition to compliance with all applicable Benbros' policies, the observance of the law and regulations of the legal systems in which we operate is mandatory for all Benbros employees. Any violation of the law, this Code of Conduct, any Benbros guideline or policy by a Benbros employee may result in disciplinary actions.

Compliance, Competition and Antitrust Law.

Benbros is committed to promoting free and fair competition without unlawful restraints and collusion. Any violation of Competition or Antitrust Laws can have serious consequences for Benbros, Benbros' reputation and the offending Benbros employee. Such consequences may include the imposition of substantial sanctions, civil liability for damages, the invalidity of the concluded agreement at hand and/or criminal prosecution of Benbros Enterprises LLC and/or the individual involved. Therefore, each Benbros employee must always comply with all Competition and Antitrust Laws of the countries where we do business and compete with our competitors solely based on Benbros' excellent price, products, quality and service.

Benbros Enterprises LLC. is subject to a multitude of Competition and Antitrust Laws which differ from one country to another. As such, it can often be difficult to determine whether a proposed behavior or course of action may constitute a violation of local law. It is important to remember that an unlawful agreement does not need to be in writing. Also so called "gentlemen's agreements" or concerted practices the intent of which is to restrict competition or restrain trade in a particular market can be illegal even if they do not in fact have an anticompetitive effect. In case of doubt, employees should seek legal advice from their local Legal Counsel or Corporate Legal prior to taking any action. Benbros employees must refrain from engaging in any conduct or activity which could create even the mere perception of unlawful conduct. Below are examples of behaviors, which are typically illegal or might be illegal under certain circumstances. Please obtain prior approval by your local Legal Counsel or Corporate Legal regarding:

1. Any communication with a competitor about prices, allocation of customers or geographical territories, sales, terms and conditions of sales, profits, profit margins, costs or public or private bids (bid-rigging);
2. Dictating or attempting to influence a customer's resale price or imposing restrictions on use or resale;
3. Abusing a dominant market position;
4. Exclusive dealing arrangements.
5. Granting of business incentives such as special discounts, complimentary shipments, commission payments or other incentives not available to other or competing customers; and
6. Tied-selling, refusals to deal or the imposition of boycotts.

Bribery, Corruption and Fraud Prevention

Benbros will not engage in any form of bribery or corruption to secure any kind of business advantage. Accordingly, Benbros expects all its employees to refrain from any behavior that could potentially be construed as improper or contrary to the law.

All Benbros employees are strictly prohibited from offering, promising, or granting any improper benefit, directly or indirectly, to any public or foreign public official or to any domestic or foreign employee or representative of any company with the intention of:

1. influencing any act or decision;
2. securing an improper advantage;
3. causing a person to improperly perform a relevant function or action; or
4. inducing a person to use his/her influence to improperly affect an official act or decision.

In particular, our employees must not exert unlawful influence on any of the aforementioned persons, e.g., by making inappropriate gifts, doing favors or granting other advantages such as sponsoring, donations or charitable contributions. Likewise, employees may not directly or indirectly request or accept improper personal benefits such as money, gifts, favors or other advantages from business partners or third parties.

Sponsorships, donations, and charitable contributions should be made transparent and only in accordance with applicable domestic law. Conflicts of interest must be avoided. Benbros does not make any political contributions, e.g., to political parties, organizations or politicians. Each employee should be highly attentive of potentially fraudulent activities and attacks from inside or outside of the organization.

Money Laundering

It is Benbros' policy to refrain from conducting business with persons or entities who are involved in criminal or illegal activities. All employees must adhere to local and applicable foreign anti-money laundering laws and regulations. Money laundering is the transferring of cash or other funds generated from criminal or illegal activities through legitimate businesses or banks to conceal the true source and nature of the money. All cases of suspicious payment behavior or other unusual financial transactions,

which raise doubts as to the legality of the source of the funds, such as high cash transfers for instance, must be immediately reported to the Compliance Manager.

Conflicts of Interest

Conflicts of interest or the mere appearance of such a conflict must be avoided. Conflicts of interest arise if employees pursue personal activities or interests to the disadvantage of Benbros' interests. The interests of the company and the employee's private interests must be strictly segregated. The following examples describe situations in which conflicts of interest typically arise:

1. The decision whether to enter into, renew or terminate contracts with suppliers, customers or other third parties must be based only on objective and verifiable criteria, such as price, quality of the service or product, reliability of the contracting partner etc. Under no circumstances should such a decision be affected or influenced by personal relationships, the prospective or actual receipt of personal gain or other personal interests.
2. Any decisions relating to the recruitment of any applicant should be objectively assessed over all of his or her credentials, including qualifications, experiences and his or her individual qualities. These decisions may neither be affected by the personal interest of Brenntag's responsible employee nor on whether the applicant has a personal relationship with the former.
3. Employees may not accept employment with or provide services to companies competing or doing business with Brenntag or engage in any other kind of competing work or activity.

Foreign Compliance

Benbros is committed to complying with all applicable Foreign Trade and Customs Laws and Regulations of the countries where it does business. The objective of trade control is mainly the prevention of proliferation of weapons and the combat against terrorism.

Benbros employees must observe all applicable restrictions on local and international foreign trade, such as restrictions on exports of certain goods, services, and technologies to or imports from listed countries, entities or individuals and must also comply with all applicable trade restrictions resulting from international embargoes which typically involve the prohibition of payments or other transfer of funds into and from certain countries.

Additionally, Benbros employees are required to follow Benbros' internal trade restrictions. Any violation of sanctions and embargoes can result in significant fines and penalties for the group, may damage Brenntag's reputation severely and may also have legal consequences for any individual involved.

Therefore, Benbros expects its employees to carry out adequate due diligence and to follow all trade compliance processes in all transactions to ensure compliance with national and applicable international trade laws, regulations and restrictions.

Confidentially

No employee entrusted with confidential information about Benbros, its suppliers, customers or other business partners may disclose such information to any third party or use such information for his or her personal benefit while employed with Benbros or thereafter, unless

1. Such disclosure is made pursuant to a valid and enforceable confidentiality agreement;
2. Benbros' prior written approval is obtained from a duly authorized person (as far as confidential information of Benbros is concerned);
3. The prior written approval of a third party is obtained, (as far as confidential information of a third party is concerned);
4. The disclosure of confidential information is admissible with prior notice to any affected third party (if possible) if it is required by mandatory law, any governmental agency, court or other quasi-judicial or regulatory body.

The compliance with internal, legal, and contractual confidentiality obligations is critical for the protection of Benbros' interests and proprietary information as well as for its reputation as a trustworthy and reliable company. Any unauthorized disclosure of confidential information may cause significant harm to Benbros and its business partners

Confidential information means any non-public technical or business information, including but not limited to, all supplier and customer lists, prices, discoveries, inventions, processes, methods, techniques, equipment, know-how, trade secrets, other intellectual property and proprietary rights, procedures, formulae, protocols, specifications, research, and development, financial or marketing information as well as business strategies and plans.

Human Rights and Labor Practices

Equal Treatment

Benbros is committed to promoting equality of opportunity for all staff and job applicants. We aim to create a working environment in which all individuals can make best use of their skills and abilities, free from discrimination or harassment, and in which all decisions and promotions are objectively based on merit. We do not discriminate against any Benbros employee, business partner or third party based on national or ethnic origin, nationality, gender, gender identity, marital or civil partner status, pregnancy or maternity, age, creed, religion or belief, color, ancestry, disability or sexual orientation. Likewise, we expect all our workers to adopt this same ethos and treat each of their colleagues equally and with respect. We do not tolerate any form of discrimination, harassment or bullying in the workplace which includes offensive verbal, physical, visual, or sexual behavior or actions directed towards an individual.

Fair Working Conditions

Benbros considers it a duty to be a social employer worldwide and treats its employees with respect and honesty. Benbros complies with all occupational health and safety provisions to warrant labor safety at the working place and does not engage in any kind of compulsory or child labor. Benntag also complies with all applicable laws concerning minimum wage and maximum working hours in the countries it operates and respects their employees' right to freedom of association and to bargain collectively and will not take or tolerate any action intended to interfere with the exercise of such rights. Benbros expects its employees to report any violation of the standards to their direct supervisor, HR Department and/or the Regional Compliance Manager.

Compliance Management

Benbros Enterprises LLC maintains a comprehensive system designed to promote and reinforce compliant behavior. The elements of this system foster a positive compliance culture throughout our organization and help ensure integrity is part of every employee's daily business activity.