



CODE OF CONDUCT

compliance
starts with me

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FOREWORD

Our purpose to 'make the world a brighter place' guides our decision-making and activities.

Our corporate conduct is characterized by a sense of responsibility as well as ethical principles, based on our commitment to the Universal Declaration of Human Rights, the fundamental Conventions of the International Labour Organization, the United Nations' Global Compact (UNGC), the United Nations' Guiding Principles of Business and Human Rights and the OECD Guidelines for Multinational Enterprises and compliance with applicable legislation.

This Code of Conduct sets the basic standard regarding how we must act in our business dealings and behave towards each other within the Covestro group. These standards are expressed in the paragraphs 'Our Rules'. In the sections 'Your Responsibility', the expert functions express and explain their expectations to our employees worldwide. The Code applies worldwide at all Covestro Group sites and for all business units. It can be expanded through local compliance programs if required by local laws.

Furthermore, it goes without saying that the Code of Conduct applies equally to everyone – Board of Management members, supervisors, and every employee. It is published with the goal of strengthening our mutual understanding of lawful, ethical and sustainable conduct and gives guidance for day-to-day practice. Covestro will forgo any business that would only be possible by violating the law, company rules or commitments. No supervisor may instruct to the contrary.

The principles outlined are passed on in our global supplier network via our Supplier Code of Conduct.¹

If you have any doubt regarding correct professional behavior, you should seek help and advice and openly discuss any issues.

Our guiding principle 'Compliance starts with me' highlights the responsibility that each of us has when it comes to the topic of compliance. I, therefore, ask you in the name of the Board of Management to familiarize yourself with the content of our Code of Conduct and to make it a part of your everyday behavior and decisions.

Dr. Markus Steilemann



¹ www.covestro.com

GENERAL

Why do we have a Code of Conduct and what does it mean for me?

This Code of Conduct sets the basic standards regarding how we must act in our business dealings and behave towards each other within the Covestro group.

It is intended to protect Covestro, its employees as well as members of the Board of Management from misconduct.

All Covestro Board of Management members, supervisors, and employees must adhere to the Code of Conduct.

What are the consequences in case of misconduct?

Compliance related misconduct can have serious repercussions.

Besides a negative impact on people and the environment, these can include criminal sanctions for the company, its representatives and employees, significant fines and financial damages, reputational damages and the erosion of Covestro's culture and employee trust.

Depending on the severity of the misconduct, disciplinary actions against involved employees can be the consequence. The type of disciplinary actions depends on the circumstances.

Do I have to report any suspected compliance violations?

All Covestro employees and Board of Management members are required to report suspected compliance violations immediately upon becoming aware of them. This includes suspected violations of human rights and environmental obligations. There is also a duty to report suspected violations of human rights and environmental obligations at our direct and indirect suppliers.

Failure to report, properly investigate and remedy compliance violations can have serious repercussions, as described above.

Internal reporting channels are available to receive reports - open or anonymously - on suspected compliance violations:

- the Local Compliance Officers,
- the employees of the Global Compliance Office,
- the Covestro SpeakUp! Line and
- the Chief Compliance Officer.

In addition, reports can also be directed to the supervisor.

Any form of retaliation or intimidation for reporting a suspected compliance violation in good faith or for the participation in an investigation is prohibited.

Covestro SpeakUp! Line

If you want to report a suspected compliance violation, Covestro offers a phone hotline and a web-reporting tool (available 24/7) - open or anonymously.

These reporting channels can also be used to report suspected risks or violations of human rights and environmental obligations in the supply chain (i.e. at our direct and indirect suppliers).

Phone:

China: 400-120-0203

Germany: 0800-181-8850

Netherlands: 0800-351-0054

USA: 1-833-373-1003

Other countries:

The telephone numbers for all countries can be found under covestro.ethicspoint.com or on the CovestroNet.

Web Reporting:

covestro.ethicspoint.com

I am a supervisor. What do I have to consider?

You must act and behave as a role model. Always be aware that your tone from the top can make the difference.

You must organize your area of responsibility so as to ensure adherence to this Code of Conduct and applicable laws.

In particular, you must communicate the applicable rules in your area of responsibility and monitor their compliance and enforcement.

You must address problems actively and resolve them.

Compliance Management System

Covestro maintains a comprehensive, globally implemented Compliance Management System to support and strengthen compliance in the actions of its employees.

The elements of this Compliance Management System (CMS) are intended to promote a positive compliance culture within the company worldwide and help all employees to act with integrity in their professional activities.

Covestro's CMS consists of the basic elements Compliance Culture, Compliance Objectives, Compliance Risks, Compliance Program, Compliance Organization, Compliance Communication and Compliance Monitoring & Improvement.

Compliance Organization

The Board of Management of Covestro AG appoints the General Counsel of Covestro AG as Chief Compliance Officer. In this function he or she reports directly to the Board of Management, but also has the right to involve the Chairperson of the Supervisory Board or the Chairperson of the Audit Committee of the Supervisory Board directly with regard to any Compliance investigation.

In addition to the Chief Compliance Officer, there is a Compliance Officer nominated in every country organization in which Covestro is represented by a separate legal entity. Further details of the compliance organization in the companies and countries are available in our CovestroNet.

The objectives of Covestro's Compliance Organization are to:

- foster and reinforce conduct per compliance requirements,
- identify risks for potential violations,
- implement preventive measures,
- uncover, remedy and proactively eliminate a repeat occurrence of any compliance violations, and
- achieve continuous improvement of Covestro's Compliance Management System.



LABOR AND EMPLOYMENT

Our Principle:

We provide and enable fair and respectful working conditions.

Our Rules

We at Covestro provide and enable a work environment that lives up to the human rights of fair working conditions which includes inter alia compliance with child labor laws, protection of persons under the age of 18 ('young workers'), prohibition of forced labor, fair pay, the right to rest, parental protection, respect for physical integrity, and freedom from discrimination and harassment. We safeguard the freedom of association including the right to refrain thereof.

We create an inclusive work environment built on dignity, respect and trust. We respect the needs and beliefs of colleagues and value inclusion and belonging as stated in our people strategy.

We base employment decisions exclusively on job-related requirements and on an individual's qualifications to perform a job. All aspects of employment including hiring, promotion, compensation and benefits are carried out free of discrimination or harassment based on national, ethnic or social origin, race or color, religion or belief, age, health status or disability, genetic information, veteran status, sex (including pregnancy), sexual orientation, gender identity, gender expression or any unlawful criterion, existing under applicable laws.²

Your Responsibility

Take care of yourself and others:

Contribute to building and maintaining a work environment free of discrimination and other disrespectful behavior by treating all persons with dignity, respect and fairness.

Be open-minded and inclusive:

Create an environment where all colleagues are encouraged to share their ideas and be heard.

Help each other grow:

Duly consider educational and training needs.

Have courage:

Speak up when observing harassment of any kind, bullying or other disrespectful or harmful behaviors by any person. Speak up when circumstances seem not to match with our commitment to human and labor rights.

What you should know

The Covestro People Strategy describes Covestro's overall plan how to attract, engage, train and retain its workforce. We are convinced that driving our Covestro core values is the precondition to future success business strategy.

A few definitions for clarifications:

Discrimination:

The practice of treating a person differently based on Non-Work-Related Criteria.

Harassment:

Refers to behavior which is not welcome and is intimidating, offensive or hostile that creates a negative work environment, makes someone feel threatened, or negatively affects an individual.

Child Labor:

Employment of a person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country of employment, whichever is greater.

Young workers:

Persons under the age of 18 whose emotional, mental and physical development deserves special protection in order not to jeopardize their personal development.

² With the involvement of employee representatives where legally required.

HEALTH AND SAFETY

Our Principle:

We take care of ourselves and others by prioritizing safety and health at all times.

Our Rules

We at Covestro ensure a safe work environment that lives up to the human right of safe working conditions.

We identify, assess, and mitigate potential hazards to health and safety throughout our operations, considering potential sources of hazard, and establishing required processes and procedures.

We stay alert to potential hazards to people's health and safety from our products throughout their lifecycle as well as from our operations and take appropriate action. We source materials and services responsibly and in compliance with all applicable laws.

We ensure that all personnel are adequately trained to prevent hazards in connection with their work responsibilities.

We provide necessary and adequate personal protective equipment as well as other supporting equipment to achieve optimum safety.

We establish, maintain and train on emergency preparedness as well as incident reporting and remediation procedures.

We maintain our license to operate by ensuring safe reliable operation and the elimination and mitigation of process safety risks, accomplished through our iterative process and machinery safety reviews, rigorous management of change process and risk-based work permitting.

We grant access to clean sanitary installations, drinking water and eating facilities, and establish safe and appropriate temperature, sufficient lighting and ventilation.

Your Responsibility

Take care of yourself and others:

Ensure that you and your team are aware of and adhere to applicable safety procedures. Speak about it with potentially affected colleagues.

Innovate and transform:

Stay alert for potential new hazards and health issues that may arise from changed processes, business practices and other circumstances. Help reduce incidents to zero by constantly adapting to the situation.

Connect and collaborate:

Talk about your observations and experiences on maintaining health and safety with colleagues. Address any deviation from our commitment to ensuring safe working conditions. Keep awareness high, every day.

Solve problems and get the right things done:

If you identify a potential hazard, address it with your supervisor and help to improve the situation for the future.

What you should know

Safety management and continuous improvement are vital for a strong safety culture.

We strive to prevent injuries and incidents during day-to-day work and while on work-related travel. We strive to reduce hazards and together target a Recordable Incident Rate towards zero.

In addition to preventing injuries and incidents we must be good stewards of our products. Product stewardship means comprehensively evaluating health, safety, and environmental risks in connection with the design and development, production, handling, packaging, storage, transportation and the use of our products.

We want our products to be safe throughout their entire life cycle – from research to production and marketing to their intended use by customers all the way to disposal and recycling.

Contact:

Health, Safety, Environment & Reliability or Group Quality, respectively

Our Principle:

We respect the human rights to privacy of individuals and protect personal data.

Our Rules

We collect and process personal data of employees, business partners, investors, and other stakeholders during normal business activities and in accordance with applicable data privacy requirements.

We set high standards of personal data protection to safeguard the personal rights and privacy of individuals, while ensuring secure and legitimate data exchange and efficient business processes.

If a data breach occurs, we notify affected individuals and/or competent authorities timely as required by applicable laws.

Your Responsibility

Think and act responsibly in the interests of the company:

Collect or process personal data only as necessary for a specific purpose.

Solely use personal data for the specified purpose and delete it after the fulfillment of this purpose taking into consideration local retention requirements and any applicable legal holds.

Inform individuals about the processing of their personal data, in particular the nature, scope and purpose of the processing.

Take steps to always protect personal data against loss or counterfeiting and work to prevent unauthorized access or unlawful use.

Report any known or suspected data privacy incidents or breaches to your supervisor, local data privacy officer or member of the legal team.

What you should know

Data privacy laws apply to personal data. This includes information that can be associated with a natural person (= the data subject), even if the identification of the person can be determined only by a combination of information or by random additional knowledge.

The accidental or unlawful loss, theft, deletion or destruction, modification, unauthorized disclosure or access to personal data could result in a data privacy incident or breach.

If the security of personal data is compromised, it may create a risk to the rights and freedoms of the persons concerned. Therefore, it is important for employees to report such situations immediately so they can be evaluated, addressed accordingly and avoided in the future. This applies in particular if personal data is affected that is defined by a legislator as particularly worthy of protection.

Contact:

Law, Intellectual
Property and
Compliance

ENVIRONMENT AND PRODUCT STEWARDSHIP

Our Principle:

We safeguard individuals and the environment during the lifecycle of our products.

Our Rules

We continually work to improve our greenhouse gas emissions and establish goals and implement actions to achieve net zero.

We respect the human rights of individuals and communities potentially affected by our operations and our products by constantly working on emissions, waste, wastewater and pollutants from our operations.

We obtain and uphold all necessary permits for our operations and ensure that all conditions and requirements are adhered to.

We respect all living beings and strive to minimize animal testing while ensuring the safety of our products.

We respect the natural resources and conditions of livelihood throughout our fresh water, raw materials, and land use. Specifically, we are committed to the responsible use of water resources in the light of an increasing water scarcity around the world. This is to help ensure sustainable access to adequate quantities of acceptable quality water for sustaining livelihoods, human well-being, and socio-economic development.

Your Responsibility

Take care of yourself and others:

Identify sources of environmental hazard and help design and implement mitigation measures.

Innovate and transform:

Improve existing processes and procedures to help further reduce environmental impacts and to become more environmentally friendly - every day.

Think and act responsibly in the interests of the company:

Regularly identify and evaluate existing and new compliance obligations to ensure compliance with external requirements, as well as understanding the needs and expectations of various stakeholders.

What you should know

Product stewardship means comprehensively evaluating health, safety, and environmental risks in connection with the design and development, production, handling, packaging, storage, transportation and the use of our products.

All chemical products placed on the market undergo a multiple-step product assessment process. Within this process, chemicals posing a hazard to humans, or the environment are identified. The products are classified, labelled and managed according to legal requirements to ensure their safe handling, movement, storage and to enable their safe use, recycling or reuse and disposal.

We produce safety data sheets and labeling for all chemicals in up to 40 different languages, including chemicals that are not subject to any legal obligation.

We constantly work to lessen the environmental impact of our activities, products and services, and to develop innovative solutions that support our customers in improving their resource efficiency and reducing emissions.

Resource-efficient processes in our operations help to protect the environment and at the same time cut the costs associated with materials, energy, emissions and disposal management.

Economic and environmental considerations encourage us to use resources, materials and energy conscientiously. This also includes topics such as water scarcity and the purchase of resource and energy-efficient products and services as appropriate.

We are building a future-proof, innovative, and sustainable product portfolio using the Product Sustainability Assessment (PSA) based on the methodology developed by the World Business Council for Sustainable Development (WBCSD).

Contact:
Health, Safety,
Environment
& Reliability

PLANET.

CIRCULARITY

PEOPLE • PROFIT

Our Principle:

We will be fully circular.

Our Rules

Circular Economy is our vision and pathway to addressing our industry's two major challenges, climate neutrality and re-using plastic at the end of its use time as valuable raw material again.

Key building blocks for realizing a circular economy are green energy, alternative raw materials, innovative recycling technologies, and partnerships along the entire value chain.

Long-term, we strive to use entirely non-fossil sources for our energy supply and our raw materials and run the carbon used for our products in loops. Our future raw materials will be entirely CO₂, bio or waste based, likely a combination of all these three sources.

Your Responsibility

Set a future direction:

It is essential that all Covestro employees contribute to quickly find and implement sustainable practices to stop environmental pollution and the overexploitation of the world's increasingly scarce natural resources.

A circular economic model that mimics nature, by anchoring the principles of restoration, climate neutrality and resource protection, is essential for creating better materials and products for a prosperous future.

Our goal is to develop circular solutions - that run carbon in a loop - for all our industries and applications to support our vision of becoming fully circular in all our operations and processes.

Changing from a linear to a circular business model will require changes in all parts of Covestro, e.g., by changing energy and raw material supply, product design, composition and applications or project or even company steering key performance indicators.

What you should know

Working towards a Circular Economy means finding new solutions that run carbon in a loop and making them economically viable.

The transition to a Circular Economy entails the opportunity to intensify and innovate the way we work together with our suppliers and customers and with the whole value chain.

Keeping end-of-life materials in value cycles is a shared responsibility as well as a business opportunity that everyone, Covestro, our customers and the end-consumers can contribute to.

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COMPETITION AND ANTITRUST

Our Principle:

We compete fairly in the marketplace.

Our Rules

We compete on the merits of our products and services and firmly support the existence of a free and open market.

We do not agree with (potential) competitors upon prices or price elements, delivery quantities, margins, costs to be borne or other trading conditions.

We do not agree on or allocate markets with (potential) competitors (especially in relation to market shares or quotas), customers or territories.

We do not share strategic information with competitors.

We do not control directly or indirectly the resale prices of our customers.

We do not agree directly or indirectly on export bans, territorial protection, exclusivity for customers or online resale limitations without prior involvement of Law, Intellectual Property and Compliance.

In case of a dominant position, we strictly respect the special antitrust rules for these situations.

Your Responsibility

Have courage:

Do not have contacts of any kind with competitors that could create the appearance of improper agreements or understandings. Actively disassociate yourself!

Do not propose or enter into any agreement or understanding with any competitor about any aspect of competition between Covestro and a competitor.

Do not propose or enter into any agreements or understandings that restrict the price at which a party may resell a product or service.

Do not propose or enter into any agreement with any other party regarding whether or how to bid.

Be passionate about our customers:

Be fair, factual and complete in our advertising, sales and promotional materials, and our interactions in the market.

What you should know

Antitrust law applies to direct dealings with competitors, customers and suppliers of products and/or services along the entire value chain, regardless of time and place. Antitrust infringements can take place in any market, e.g., labor markets.

Even when circumstances get difficult for business resorting to unlawful agreements with competitors is not acceptable. Compliance is the only permissible course of action, even in a crisis. Violations of the antitrust laws of the individual countries and regions in which Covestro does business, including, in particular, U.S. and European antitrust laws, can have dramatic consequences for the company.

Typical topics that have the effect of impacting competition are:

- Prices
- Bids
- Customers, suppliers, sales territories or product lines
- Terms or conditions of sale
- Production, sales capacity or volume
- Costs, profits or margins
- Market share
- Sales, marketing or technical development or R&D strategies for products or services
- Distribution methods
- Business strategies
- Wages

Contact:

Law, Intellectual Property and Compliance

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CORRUPTION PREVENTION

Our Principle:

We reject all forms of corruption.

Our Rules

We do not tolerate corruption and will refuse any business opportunity with both, public and private sectors, that involves any form of unjustified payment, bribe or other advantage.

We prohibit any facilitation payments to expedite routine administrative actions except in situations with an imminent and serious threat to our employees.

We allow employees to offer or give modest benefits, such as gifts or hospitality (entertainment), to third parties in certain situations during the normal course of business consistent with local procedures. Employees cannot offer or give a benefit if the intention is to induce favorable treatment.

We maintain risk-based controls aimed at preventing and detecting corruption.

Your Responsibility

Have courage:

Refuse

- requests for payments in cash or by unusual means, such as through bank accounts in jurisdictions outside the country where the services are being offered or where the partner has its place of business,
- invoices from or payments to someone other than our contractual partner,
- demands for commissions, bonuses or upfront payments more than the market rate,
- requests for payment without the appropriate level of supporting documentation for the consideration or service,
- requests to alter valid invoices or to create fictitious invoices,
- requests to contract a specific third party if said third party lacks experience or capacity to perform the contract.

What you should know

Bribery means giving, offering or promising anything of value to gain an improper business advantage.

Facilitation payments are giving of a small payment of cash or anything of value to a government official to secure or speed up a routine government action to which Covestro is entitled to.

Kickbacks are bribes fulfilled after an enterprise has awarded a contract to a third party.

Anti-corruption laws do not distinguish between the acts of a company and the acts of a third party performing services on behalf of a company. In certain circumstances, Covestro may be held responsible for the acts of third parties.

These third parties include, for example, sales agents, consultants, freight forwarders and/or custom brokers.

Contact:

Law, Intellectual Property and Compliance

INTELLECTUAL PROPERTY RIGHTS

Our Principle:

We protect and respect intellectual property rights.

Our Rules

We take utmost care to ensure that our intellectual property rights are legally protected to the fullest extent.

We respect the valid, legally recognized intellectual property rights of others and do not use them without permission.

Your Responsibility

Think and act responsibly in the interests of the company:

Properly legally protect trade secrets, knowledge and new development results before you share them with third parties. The same care must be taken with information shared over the company's intranet.

Take care to avoid any unintentional transfer of intellectual property through the negligent handling of Covestro information or information belonging to a third party in public, such as working with laptop computers in full view of others or making casual comments in public or in presentations.

Protect business data against unauthorized access.

Restrict making copies of business papers or data files unless for necessary work-related purposes only.

Protect and secure Covestro intellectual property by consulting the legal department and obtain express written consent before you create or dispose of Covestro intellectual property or execute an agreement.

Respect the valid, legally recognized property rights of third parties and do not use them without permission.

What you should know

Intellectual property rights include patents, trademarks, utility models, designs, copyrights, and trade secrets.

Intellectual property rights are the 'reward' for our endeavors and expenditures in the areas of research and development, marketing and business development, and are extremely valuable business assets.

Contact:

Law, Intellectual Property and Compliance

IT-, OT AND INFORMATION SECURITY

Our Principle:

We protect our information and in general our IT and production systems in a modern and efficient way.

Our Rules

We take utmost care to ensure the security of the information we create, process and handle.

Your Responsibility

Think and act responsibly in the interests of the company:

When developing applications or systems, as well as when using them, always pay attention to security, i.e. build robust systems with an 'encryption' approach and reduce access rights to a required minimum.

Keep the systems in an up-to-date and safe condition throughout their entire lifetime.

If you spot a security issue, contact our Cyber Defense Team.

Make sure that no information is unintentionally passed on or even published by Covestro or third parties, e.g., when working with the laptop in public or by making verbal remarks during public presentations.

What you should know

There is no digitalization without security. Information Security ensures both technical and regulatory compliance and enables us to stay in business.

FOREIGN TRADE LAW COMPLIANCE

Our Principle:

We comply with applicable foreign trade laws and sanctions.

Our Rules

We comply with foreign trade law provisions and sanctions that regulate cross-border transfers of goods, software, and technology.

We ensure proper export classification of goods, software, or technology to determine if they require government authorization for export.

We maintain strict policies regarding interaction with State Sponsors of Terrorism and other sanctioned countries or persons. We forbid activities intended to circumvent foreign trade laws.

Your Responsibility

Think and act responsibly in the interests of the company:

Confirm all necessary licenses or authorizations are in place before any export transaction and adhere to all export license or license exception requirements.

Ensure compliance with the 'Know your Customer/Know your Supplier' requirements to ensure business is not conducted with parties identified on government restricted lists

US-Persons may not participate, in any way, in any transactions or business with US sanctioned countries, parties or persons unless authorized.

Consult the local Export Control Officer in case of doubt.

What you should know

Sanctions (including embargoes) can restrict trade in goods and services.

Foreign Trade laws regulate cross-border transfers of goods, software, and technology that can be used for military or weapons proliferation purposes, as well as for the violation of Human Rights. Some countries also control the release of technical data to foreign nationals within their borders.

Technology:

Specific information necessary for the development, manufacture or use of a good.

US-Persons:

Citizens, permanent residents (i.e., green card holders) or persons physically present in the US.

Dual-use items:

Goods, software and technology that may be used for both civil and military purposes. Dual-use items subject to export control are specified in EU, US or other local laws.



INSIDER TRADING COMPLIANCE

Our Principle:

We are committed to safeguarding equal opportunity in securities trading.

Our Rules

In the interests of fair disclosure, we treat all Covestro shareholders and major target audiences the same when it comes to the provision of information, and we announce any important corporate news without delay.

We give shareholders timely access to information that Covestro publishes outside of Germany in compliance with applicable foreign capital market regulations.

We prohibit, in accordance with applicable laws, the use of inside information for personal gain or the gain of others. We also prohibit disclosing to another person any inside information without authorization or inducing someone to buy or sell a financial instrument on the basis of inside information.

Your Responsibility

Think and act responsibly in the interests of the company:

Maintain strict secrecy with respect to any inside, non-public information about Covestro that could affect its share price.

If you have inside information do not

- purchase or sell Covestro financial instruments,
- cancel or modify any orders that you have placed before receiving inside information, or
- recommend buying or selling Covestro financial instruments to anyone.

If you are subject to a blackout-period, do

- generally not purchase or sell Covestro financial instruments during this period, or
- not recommend buying or selling Covestro financial instruments during this period to anyone.

What you should know

The aim of the provisions of insider trading laws is to protect the integrity of capital markets and investor confidence in that integrity.

Insider trading laws prohibit trading in securities on the basis of non-public information or the sharing of such information with third parties.

Whoever uses inside information for himself or herself or others and then buys or sells financial instruments becomes punishable - regardless of the way in which he or she learned of the inside information.

Common examples of inside information are:

- unexpected (positive or negative) quarterly or annual results of the Covestro Group (including outlook)
- unexpected changes in the management of the company, in particular in Covestro AG's Board of Management (e.g., appointment of a new CEO)
- material changes in the Group strategy
- significant M&A activities
- unexpected changes with regard to the authorization of products or processes
- unexpected failure to grant or unexpectedly revoke operating licenses of essential installations; and
- successes or failures in very important court trials

Contact:

Law, Intellectual
Property and
Compliance

PROFIT. PEOPLE • PLANET

RECORDS AND REPORTING

Our Principle:

We require proper record-keeping and transparent financial and non-financial reporting.

Our Rules

Covestro's internal control systems provide for the proper documentation of an entity's key business processes and the establishment of controls to ensure that all transaction details relevant for accounting and non-financial reporting purposes are recorded clearly, completely, correctly and in a timely manner.

Therefore, we keep our files complete, organized and easy to understand.

Your Responsibility

Think and act responsibly in the interests of the company:

Keep records and files in such a way as to permit delegation to a colleague at any time.

Retain records for as long as statutory or internal provisions require, and never destroy documents relevant to threatened or pending official or judicial proceedings.

If you are tasked with presenting information that is relevant to Covestro's financial or non-financial reporting and destined for public disclosure you are responsible for ensuring that this information is complete and accurate.

What you should know

Covestro's accounting records and related documents must reflect all business transactions completely, comprehensibly and correctly and provide a true and fair picture of the company's assets.

All items which are relevant for financial reporting must be supported by complete and correct documents and accounted for accordingly in a timely manner. Also, items with relevance for non-financial reporting must be supported by appropriate documentation.

CONFLICTS OF INTEREST

Our Principle:

We disclose conflicts of interest and address them consistently and transparently.

Our Rules

Private interests and personal relationships must be kept separated from the business interests of Covestro.

Conflicts of interest must be avoided wherever possible. If a conflict of interest cannot be avoided in a specific situation, employees must disclose the conflict as early as possible in accordance with local procedures.

Your Responsibility

Think and act responsibly in the interests of the company:

As an employee you are responsible to disclose any actual, potential or perceived conflict of interest to your supervisor and document that you did so in accordance with local procedures.

As a supervisor you are responsible to appropriately address the situation, take actions to solve the conflict and document that you did so in accordance with local procedures.

What you should know

A conflict of interest may arise in various contexts of our work and can affect actions and decisions. Having a conflict of interest is not wrong per se, but it can become a problem if a Covestro employee does not disclose the conflict or if a Covestro employee's private interests are not clearly separated from the business interests of Covestro.

Even if no improper interference occurs, it might nevertheless appear to other employees or third parties that there is a conflict of interest influencing the decisions being made rather than objective criteria.

If not handled correctly, conflicts of interest can cause serious financial and reputational damages for Covestro, but also lead to negative consequences for employees and supervisors.

Contact:

Law, Intellectual Property and Compliance



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www.covestro.com

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