One Company
One Code of Conduct
The BASF Compliance Program
Dear Colleagues,

BASF combines economic success, social responsibility and environmental protection. We do this as one company. Consequently, our compliance standards are fundamentally the same on a global level and therefore based on one global Code of Conduct.

To be successful in what we do and to implement our “We create chemistry” strategy, it is essential that each and every member of the BASF team understands and lives our values: Creative – Open – Responsible – Entrepreneurial.

**Our value “Responsible” states that we strictly adhere to our compliance standards. What does this mean?**

Nothing is more important than our integrity as a company and as individuals. BASF is strictly committed to high standards of legal compliance as well as business ethics and expects all employees to adhere to these standards. Such commitment must run deeply through the entire organization, as every employee is an ambassador for the company. For us, behavior that complies with our standards is of utmost importance. There can be no compromises.

This is not new and, with all due respect, I believe our compliance system, which has been continuously improved and further developed since its introduction, has proven itself. Nevertheless, compliance will always remain a challenge and we must constantly foster and further develop our compliance culture on the basis of our values.

We therefore expect you to take personal responsibility for complying with all:
- applicable laws
- fundamental international standards and
- corporate policies and guidelines

The BASF Code of Conduct summarizes important laws and corporate policies that govern the behavior of all BASF employees in their dealings with business partners, office holders, other employees and society. It guides us to make the right choices; it will, however, not cover every situation you may face. Specific laws and regulations may apply in specific fields of activity or locations.

Ensuring compliance is an integral part of our daily work. We must maintain and further develop a genuine culture where executives act as role models promoting business ethics and legal compliance, and where compliant behavior is everyone’s responsibility.

BASF is committed to give you all the information and support needed to meet your obligations. If you are in doubt, just ask. Thank you for your commitment.

Sincerely,

Kurt Bock
Chairman of the Board of Executive Directors of BASF SE
This Code of Conduct is binding for all employees of the BASF Group worldwide. While it is not intended to describe every law and internal policy that may apply to you, it defines basic, globally applicable standards of conduct and what is expected from you. Please make sure that you understand the standards of the Code of Conduct as well as the respective local laws and corporate guidelines, and always abide by them and attend all mandatory and necessary training sessions. Managers are responsible for supporting their employees in this endeavor.

Violations of the law by just one employee can seriously harm our company’s reputation and inflict considerable damage, including financial damage. Our company does not tolerate these violations and will not protect those responsible for sanctions imposed by the authorities. Violation of laws, international standards and internal rules may result in disciplinary action, including termination of employment, and may be subject to civil or criminal action.

In almost all cases, breaches of the law can be avoided by timely advice. If you have doubts about the legal or ethical implications of your own conduct or questions about what is required, you are requested to seek advice or assistance from your manager, the relevant department (e.g. human resources, legal or finance department) or the Compliance Officer. You must also report any suspected or actual violation of law or company policy. In such cases, you may also use the Compliance Hotline.

The contact details for your respective Compliance Hotline can be found on the BASF Intranet under compliance.basf.net/hotline.

You will find more details regarding BASF’s Compliance Program on the BASF Intranet under compliance.basf.net.

For this purpose, confidential (and in most cases toll-free) Compliance Hotlines have been established in all regions of the world. Messages can also be left anonymously. These cases will be thoroughly investigated and handled as confidentially as possible. BASF strictly prohibits retaliation against any person who uses the Compliance Hotline in good faith.

“Our Chief Compliance Officer is supported by around 100 Compliance Officers worldwide.”
## Table of Contents

8  Human Rights, Labor and Social Standards  
9  Protection of Environment, Health, and Safety  
10 Antitrust Laws  
12 Corruption  
14 Gifts and Entertainment  
15 Conflicts of Interest  
17 Information Protection and Insider Trading Laws  
18 Protection of Data Privacy  
19 Imports and Exports  
20 Protection of Company Property and Property of Business Partners  
21 Money Laundering  
22 Amendments to the Code of Conduct  
23 Contact
BASF seeks to ensure that the conduct of all BASF employees is consistent with internationally agreed-upon standards of human rights as well as core labor and social standards. These standards include the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labor Organisation (ILO) Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.

BASF is particularly committed to the abolition of all forms of child and forced labor, the principle of non-discrimination, the recognition of the freedom to associate, collective bargaining and social partnership, fair compensation and benefits based on local market conditions, entitlement to adequate working hours and paid leave as well as maintaining proportionality in disciplinary measures and security.

BASF is firmly committed to equal employment opportunities and to compliance with all applicable laws that particularly prohibit employment discrimination on the basis of age, race, color, sex, sexual orientation, gender identity or expression, national origin, religion or disability. This policy applies to all employment decisions, including recruiting, hiring, training, job rotations, promotions, pay practices, benefits, disciplinary actions and terminations. BASF also strictly prohibits sexual harassment and other workplace harassment. BASF promotes a diverse and inclusive workplace where all employees must treat each other with respect and dignity.

“We act in accordance with internationally declared human rights, labor and social standards and adhere to applicable laws within the framework of our business activities.”
Protection of Environment, Health, and Safety

At BASF, we drive sustainable solutions and take on economic, ecological and social responsibility. We never compromise on safety. Economic considerations do not take priority over safety, health and environmental protection.

Compliance with all legislation to protect humans and the environment is one of our basic tenets. This applies to our products as well as to our processes.

You are required to deal responsibly with natural resources and to protect the environment in your area of work. Likewise, the health and safety of all humans is of utmost importance to BASF. According to the principle of Responsible Care, we act responsibly to protect and preserve our employees’, neighbors’ and business partners’ health. Each employee is responsible for working safely at all times and must comply with all applicable environmental and occupational health and safety laws and regulations, as well as with the corresponding corporate policies and rules. All managers have the duty to instruct, supervise and support their team in living up to this responsibility. In areas where no express regulations or corporate policies and rules exist for environmental protection and occupational health and safety, you must make your own decisions based on common sense, in consultation with your manager where necessary.

Air, water and land may be used for industrial purposes only within the framework of approvals granted by the relevant authorities. The same applies when erecting and operating or modifying and extending production plants. Every unauthorized release of substances must be avoided.

Waste must be disposed of in accordance with legal requirements. If the services of third parties are used for this purpose, it must be ensured that they, too, comply with environmental regulations and our corporate standards.

BASF often goes beyond the minimum requirements of existing laws and constantly strives to improve procedures and processes to further minimize our environmental impact and prevent health risks. However, if incidents or plant malfunctions nevertheless occur, the relevant corporate units must be immediately and comprehensively informed. The goal is to initiate the appropriate emergency response and damage repair measures as promptly and as precisely as possible. Furthermore, these units must immediately communicate with governmental authorities and provide the information required by law. Where necessary, the units responsible for environmental protection must also exercise their duty to warn and inform the neighborhood.

Employees who report such incidents in good faith need not fear any retaliation. On the contrary, omitted, delayed or incomplete reports are not in the company’s interest.

“Each employee shares in the responsibility to protect human beings and the environment in his or her area of work.”
Our policy is to promote fair competition. We therefore require all employees to strictly abide by all applicable antitrust laws.

Violations are subject to severe sanctions and fines and may lead to the invalidity of the affected agreement.

**Agreements between competitors**

Agreements and concerted practices between competitors (“horizontal agreements”) are prohibited if their objective or effect is to prevent or restrict competition.

These comprise, for example, agreements on prices, collusion on tender bids, allocation of customers, terms of sale or procurement, production or sales quotas, or carving up geographical markets.

Not only agreements, i.e., express contractual arrangements, but also concerted action resulting from a sequence of unilateral declarations (e.g., announcements of price increases aimed at triggering the same reactions from competitors) are prohibited.
Any direct or indirect exchange of information between competitors (which can include non-exclusive distributors) is prohibited, such as information on customers, pricing, costs, salaries, terms of sale, methods of distribution, market shares, production volumes, bidding or strategies (business and research strategies, for example).

In the course of contact with competitors, you must always ensure that no information is accepted or given which permits any conclusions regarding the present or future market conduct of the information-providing party.

In case of horizontal agreements, the strict regulations of the European antitrust law must be complied with worldwide, irrespective of local laws that may be less strict or non-existent.

**Vertical Agreements**
Many types of vertical agreements, i.e., arrangements and agreements between suppliers and customers or patent holders and licensees, are forbidden in the E.U., the United States and other countries, and may lead to the imposition of fines or the invalidity of the respective agreements.

These include restrictions of the customer’s freedom to set prices and conditions of supply with respect to their business partners (geographical, customer or application restrictions), certain most-favored-customer clauses, exclusivity such as total requirement or exclusive supply, as well as non-competition.

In many cases, the permissibility and, as a result, effectiveness of a restraint will depend on the duration and intensity as well as the market position of those involved.

Furthermore, there are differences in the permissibility of vertical restraints in different jurisdictions. Therefore, unlike horizontal restraints, local laws prevail and must be checked.

**Abuse of a dominant market position**
Due to its market position in many product areas, BASF is often subject to specific rules. In principle, the abuse of a dominant market position is prohibited in the E.U., the United States, China and other countries, although with minor differences, and subject to the imposition of fines or the invalidity of the respective agreements. Such abuse can, for example, be different treatment of customers without good cause (ban on discrimination), refusal to supply, selective supply, imposition of inadequate purchase/sales prices, and conditions or tie-in arrangements without justification for the additional service demanded.

The definition of a dominant market position, as well as the limits within which a given conduct is permissible, depend on the circumstances of the individual case. Furthermore, there are different rules in different jurisdictions. Therefore, local laws prevail and must be checked.

In case of doubt in connection with antitrust laws or the permissibility of a certain behavior under such laws, you are requested to consult your manager or the legal department at an early stage.

**Our policies towards antitrust laws cover agreements between competitors, vertical agreements, and the abuse of a dominant market position.**
All our business partners, in particular our suppliers, customers, joint venture partners, contractors and distributors, must be dealt with fairly. BASF expects the same from its business partners. Our relations with all business partners shall be based solely on objective criteria, in particular quality, reliability, competitive prices, as well as compliance with environmental, social and corporate governance standards. Anti-bribery laws in most countries of the world prohibit bribes to domestic and foreign governmental officials and employees and representatives of domestic and foreign companies in the private sector.

BASF is strictly committed to fighting any kind of corruption. Therefore, BASF prohibits its employees, agents, and other third parties acting on BASF’s behalf from engaging in any form of bribery. While dealing with business partners or government officials, they must never demand or accept anything of value (e.g. cash, gifts, entertainment or any other personal benefits) which could be construed as an attempt to influence or induce business decisions. Likewise, employees of other companies or government officials must never be promised or granted any personal benefits with the intent to obtain or retain business or to gain any improper advantage for BASF.

We require all employees to inform their manager if a business partner or governmental official offers or demands any personal benefits.

Furthermore, “facilitation” or “grease” payments (i.e., small cash or non-cash benefits to office holders to facilitate administrative procedures or official acts, e.g., customs clearances, to which the company or the individual is entitled) are not allowed. If, however, the refusal to make facilitation payments would put your personal safety at risk, you may make such a payment but must inform your manager thereafter.

“Never accept or offer any benefit that could be construed as an attempt to influence or induce business decisions.”
Gifts and invitations in business are generally handled much more restrictively today than some years ago. We explicitly welcome and support this development.

Consequently, gifts, business meals or entertainment are to be given or accepted only if intended or understood as simple business courtesies which are consistent with customary business practices and which from the outset rule out any influence on a business decision or an official decree. This also applies to gifts, meals or entertainment given or accepted in the course of professional business events or conferences.

If inappropriate gifts cannot be tactfully refused, they should be accepted. In that case, the manager must be informed thereof and shall decide on the further treatment (e.g., a donation to charity).

Offering, granting, demanding or accepting cash or cash equivalents is never appropriate.

In most countries, gifts and invitations of a certain value are considered taxable benefits. You must make sure that the applicable tax law is strictly adhered to. If in doubt, you are required to consult your manager or the tax department.

Specific gift policies – in due consideration of the principles above – may exist in your country or unit (e.g., procurement). In case of doubt, you are requested to consult your Compliance Officer or the legal department.

“Only accept gifts, business meals or entertainment if they are understood to be simple business courtesies.”
Conflicts of Interest

You are expected to act in the best interests of our company and to safeguard its reputation by avoiding conflicts of interest. Personal relationships or interests must not affect business activities. This means that you must not create or maintain personal interests, which may pose, or appear to pose, a conflict with the interests of BASF or which might influence, or appear to influence, your judgment in the performance of your duties.

Each employee must inform his manager of any existing or potential conflict of interest and seek a solution together with the manager to avoid, or at least minimize, the conflict of interest.

"Employees’ private interests and the interests of the company must be strictly segregated. If you are in doubt, just ask!"

You should, for example, avoid any investment, interest, association, or activity that may cause others to doubt your fairness, integrity or ability to perform your duties objectively.
Any non-public information about BASF that, if disclosed, would be detrimental to the company, or would give someone an unfair business or personal advantage, is confidential property of the company. Inventions, patents and expertise are particularly important for the long-term success of BASF. You must always keep confidential information secret and protected against unauthorized access by third parties. You must also not exploit your knowledge of such information for your personal gain or the benefit of a third party. This also applies to confidential information disclosed to you by third parties.

You must comply with applicable policies and guidelines, e.g., the minimum requirements of information protection and the guidelines on the use of intranet, internet as well as external social media. If you are unsure what constitutes proprietary information, you should consult your manager, the competent information protection officer or the legal department.

As an employee, you may have access to material, non-public information about BASF or the affairs of a third party which, if disclosed, could impact the value of publicly-traded securities, in particular the BASF share. Insider trading laws prohibit making personal use of such information and/or disclosing it to third parties, including friends or family. Examples include information relating to the intended sale of substantial parts of the company, the acquisition or merger of businesses, undisclosed data on profits or particularly promising research results.

Individual criminal and civil liability may result from the violation of applicable insider trading laws.

“If you are unsure what constitutes proprietary information, you should consult your manager, the competent information protection officer or the legal department.”
BASF is committed to respecting the privacy and integrity of its employees and its business partners. We adhere to strict standards when processing our employees’ personal information and our business partners’ data. All personal data collected and held by BASF will be processed fairly, transparently, carefully and in compliance with the locally applicable data privacy laws.

Access to personnel records is restricted to BASF employees and agents who have appropriate authorization and a business need for that information. Confidential employee information shall not be disclosed to anyone outside the company without proper authorization or unless required by law.

In case of any doubt, you must consult the Data Protection Officer or the legal department.

“We value and protect data privacy. Personal data is collected and processed only for legitimate business reasons in full compliance with the locally applicable data privacy laws.”
Various national and international trade laws restrict or prohibit the import and export of products or services that BASF sells. These restrictions are based not only on the nature of the product, but also on the country of origin or destination and, sometimes, even on the identity of the customer (embargo). Similar restrictions may apply to the export of technology and software. Country-specific embargoes are in place for certain countries.

No person or company subject to the jurisdiction imposing an embargo may participate or assist in the import or export of goods or services from or to a country, its citizens or residents subject to an embargo.

In addition, the provisions of the Chemical Weapons Convention and the laws and international conventions regulating trafficking and dealing in narcotics, psychotropic substances or addictive substances are particularly important to our company. Therefore, none of our employees must buy, produce or sell chemicals or other substances if this violates these regulations. Without an express permit from the relevant authorities and the voluntary declaration of final destination required by BASF for certain products, no substance or technology subject to legal control or voluntary self-monitoring by BASF may be exported or sold. Where required by law, products must be kept under lock and key.

“*All employees must comply with the control regulations when buying, producing or marketing goods or when transferring or acquiring technology.*”
Protection of Company Property and Property of Business Partners

You are required to handle company property in a responsible manner and to protect BASF assets against loss, damage, theft, abuse and unauthorized use. Company property also includes intangible assets such as proprietary knowledge, intellectual property rights and copyrighted material.

Company computers and other equipment are furnished for work, not for personal use. Accordingly, you should only load software onto them that has been properly licensed.

Without the express consent of the relevant unit, company property may not be used for private purposes or removed from the company’s premises.

All employees must comply with the relevant corporate policies covering the protection of company property.

“Handle company property with care.”
Money Laundering

Money laundering means the introduction of assets (not only cash) originating from criminal offences into the regular financial and economic cycle. Money laundering is a criminal offence in the Member States of the E.U., the United States, China and various other countries.

No employee, either alone or in collaboration with third parties, may take measures that violate applicable regulations on money laundering.

Where questionable financial transactions involving transfers of cash or cash equivalents are requested, prior review by and approval from your treasurer is required.

“Be aware of potential questionable financial transactions and ask for clarification.”
Amendments to the Code of Conduct

BASF SE’s Board of Executive Directors is responsible for approving and issuing the Code of Conduct. The Code of Conduct will be periodically reviewed by BASF SE’s Chief Compliance Officer and legal department to determine whether revisions are necessary in light of changes in the law, and to ensure that our employees meet the high ethical and legal standards we expect. BASF SE’s Board of Executive Directors will be responsible for approving any revisions to the Code of Conduct.
The contact details for your respective Compliance Hotline can be found on the BASF Intranet under compliance.bASF.net/hotline.

You will find more details regarding BASF’s Compliance Program on the BASF Intranet under compliance.bASF.net.

Further Information on the BASF Internet under www.bASF.com/code-of-conduct.