

Public Affairs Standard

Valid from September 2020



The purpose of this Corporate Standard is to define the objective of Henkel's Public Affairs activities and sets general rules of conduct for these activities. These rules apply to all Henkel employees when dealing in the political environment. In addition, it reflects the worldwide tendency to a higher transparency of companies' activities in the field of public affairs and it is based on the existing Henkel Code of Conduct.

Crucial Requirements

This chapter shows the crucial requirements of this Corporate Standard. This list is non-exhaustive and to be compliant all requirements in this Corporate Standard need to be fulfilled.

Requirement	Chapter
Compliance with laws and standards: Applicable laws must be respected and complied with. Political dialogues must be conducted in compliance with Henkel's Corporate Values and Standards. All work must be carried out within the rules of the political institutions at both national and international level.	2.1
No conflict of interests or corruption: Any information or decisions must be obtained in an honest and respectful way. Staff or public authorities must never be induced to contravene rules and standards of behavior applicable to them. All business activities with and payments or other commitments to local, national, European or international politicians are prohibited.	2.2
Political donations: Direct or indirect donations on behalf of Henkel to political parties, politicians or candidates for a political office must not be made.	2.3
Transparency: Henkel-employees acting in public affairs must identify themselves as lobbyists, be transparent and open, openly declare Henkel's business interests, maintain an open dialogue with stakeholders and sign-up to lobbying registers where existing and relevant.	2.4
Political activities by employees: Henkel-employees must not use company time or resources to enable private political activity and Henkel must not interfere in any way in private political activities of its employees that are permitted by law. Political activities by employees outside work must neither be supported nor sponsored, directly or indirectly, by Henkel.	2.5

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1. Purpose and Scope

Political decision-making requires input from all stakeholders in order to develop fair, responsible and balanced solutions. That is why companies, NGOs and other interest groups are required and advised to give qualified and diverse input and share their expert knowledge with politicians, regulators, and their respective staff.

Henkel's business activities are affected by and at the same time have an impact on public policy discussions, political decisions as well as societal behavior and debates.

Therefore, Henkel is convinced that sharing expertise in the context of public policy debates and political decisions is important to best meet societal challenges and to ensure that the legitimate interests of its employees, clients, consumers and shareholders are represented at all levels in political and societal discussions.

For Henkel, the dialogue with politicians, public and regulatory authorities, NGOs, associations, and other interest groups is an opportunity for all stakeholders involved to reach the best results.

This said, Henkel's Public Affairs activities aim to:

- contribute to public discussions in Henkel's capacity as a responsible company and good corporate citizen;
- follow current scientific and public policy debates, monitoring them when they are relevant to the political environment and for Henkel as a group and employer;
- be an experienced and trusted partner for politically relevant discussions in all concerned areas of interest; and
- provide expert knowledge from the business point of view for external stakeholders in political discussions.

In order to fulfil its duty as good corporate citizen, and taking into account the above-mentioned objectives, Henkel has developed rules of conduct for Public Affairs activities as described in this Corporate Standard.

This Standard applies to any Public Affairs & Governmental Relations activities of Henkel AG & Co. KGaA and its affiliated companies ("Henkel") as listed in the consolidated financial statements of Henkel AG & Co. KGaA.

2. Henkel's General Rules for Public Affairs and Activities

Any Public Affairs activities on behalf of Henkel **must** be aligned with Henkel AG & Co. KGaA's Public Affairs & Governmental Relations department in advance and comply with the following mandatory requirements:

2.1 Compliance with laws and standards

Requirement

Applicable laws **must** be respected and complied with.

Requirement

Political dialogues **must** be conducted in compliance with Henkel's Corporate Values and Standards.

Requirement

All work **must** be carried out within the rules of the political institutions at both national and international level.

2.2 No conflict of interests or corruption

Requirement

Any information or decisions **must** be obtained in an honest and respectful way.

Requirement

Staff or public authorities **must** never be induced to contravene rules and standards of behavior applicable to them.

Requirement

All business activities with and payments or other commitments to local, national, European or international politicians are prohibited. Any other activity or commitment that could possibly be interpreted as a conflict of interest of this type **must** be subject to prior written approval by the Public Affairs & Governmental Relations department, Henkel's Compliance and Risk Committee and its Chief Compliance Officer.

2.3 Political donations

Requirement

Direct or indirect donations to political parties, politicians or candidates for a political office **must not** be made.

It is recognized that various associations of which Henkel is a member may make donations under their own responsibility and in their own name according to relevant local laws and regulations governing contributions to individual candidates for office or to political parties.

2.4 Transparency

Henkel endorses more transparency in politics and the general move to introduce registers for lobbyists.

Consequently, Henkel employees...

Requirement

... **must** identify themselves as lobbyists; **must** be transparent and open in their Public Affairs activities; **must** openly declare Henkel's business interests; **must** maintain an open dialogue with stakeholders in the political and social arenas and **must** sign up to lobbying registers of public authorities, where existing and relevant.

Where local laws and regulations impose specific reporting or disclosure requirements, said local requirements take precedence. In all other cases, this Corporate Standard shall govern and serve as guidance for Public Affairs activities.

2.5 Political activities by employees

Political activities by employees outside work are neither supported nor sponsored, directly or indirectly, by Henkel. Henkel does not interfere in any way in private political activities of its employees that are permitted by law.

Requirement

Henkel employees **must not** use company time or resources to enable private political activity and Henkel **must** not interfere in any way in private political activities of its employees that are permitted by law.

Requirement

Political activities by employees outside work **must neither** be supported **nor** sponsored, directly or indirectly, by Henkel.

Credits/Contact Information

Published by:

Henkel AG & Co. KGaA
40191 Düsseldorf
Germany

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Edited by:

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