



Business Conduct Guidelines

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I. General principles

1 General rules of conduct

1.1 Rules of conduct for employees

All employees of the senata-group contribute to a corporate culture that is characterised by fair and cooperative working relationship. Tolerance and the trustful interaction on a daily basis are part of the fundamental convictions of all employees. Moreover, each employee is committed to responsible and ethical behaviour. The identity and dignity of each individual is to be respected.

1.2 Rules of conduct when dealing with third parties

All employees, especially management personnel, must be aware that they represent the company with their behaviour. Their conduct affects both the external reputation of the company and its internal culture. All employees are expected to treat others as they themselves would expect to be treated. This fosters fair and respectful dealings with customers and other external persons having business relations with the company. Of course, this also applies to employees of other firms working within the company.

Fairness and respect also apply to advertising and the way that staff present themselves and the company internally and externally.

1.3 Discrimination

No person shall be treated unfairly, discriminated, favoured, harassed or segregated in particular because of their race, ethnic origin, colour, national origin, creed, belief, gender, age, physical characteristics, her/his looks or her/his sexual identity.

The senata-group expects its employees to be friendly, appropriate, fair and respectful in relationships with colleagues and third parties (e.g. customers, suppliers, government agencies). Thereby the employees at least contribute to the good reputation of the senata-group.

Everyone has the right to be protected from discrimination or harassment of any kind. This applies both to the senata-group internally and with third parties.

Not only managers, but also every employee has to ensure their compliance with these principles. Violations of these principles will not be tolerated. In conflicts, the supervisor or the respective Human Resources Department must be involved. They will take any necessary actions to prevent recurrence.

II. **Applicability**

Employee responsibility

Each employee has a responsibility to be familiar with the legal requirements related to her/his work, observe them and also impart the respective regulations to her/his colleagues.

Scope of application

These business conduct guidelines are subject to the senata-group and all subsidiaries, whether directly or indirectly affiliated.

III. Dealing with government and officials

1 Relations with political parties and politicians

Gifts, services, payments or loans provided by senata or its subsidiaries to any political party, a candidate for or holder of a political office are permitted only if in compliance with applicable law and approved in advance by the senata executive board.

2 Relations with government and officials

Payments, loans of corporate or personal funds or transfers of anything else of value to an official or government employee for the purpose of obtaining or directing business to the senata-group or other persons are prohibited.

IV. Conflicts of interest issues

1 Relationships with suppliers, customers and other business partners

Employees must avoid personal interests or financial activities that conflict, or appear to conflict, with the senata-groups interests, or their subsidiaries, or that influence, or appear to influence, their judgment or actions in performing their duties as employees. In particular, employees must comply with the following guidelines dealing with gifts, meals, entertainment, and other benefits from business partners.

- 1.1 senata-group employees must never request or solicit offers for meals, entertainment, gifts or other gratuities, or personal services or favours from business partners.
- 1.2 Invitations to events or business meals as the guest of a business partner may only be accepted if they are offered voluntarily, have a legitimate business purpose and are an integral part of the work agenda (e.g. lunch during a seminar or meeting, cocktail reception following meetings or dinner incorporated in a continuing work period) and are within a normal range.
- 1.3 Travel and overnight accommodations paid for by business partners are not allowed. If a business partner pays for accommodations, employees should determine the fair market value, make appropriate payment to the business partner, and arrange for reimbursement via their expense report.

- 1.4 Attendance at sport events and activities, shows or other appropriate entertainment or social activities as the guest of the same business partner is not allowed more than twice a year. A representative of the hosting company must be present.
- 1.5 If employees use suppliers or customers to receive goods or services for private purposes, fair market value must be paid for the goods or services, and the payment must be documented.
- 1.6 Solicitation or acceptance of personal financial assistance of any kind from a supplier or a customer is prohibited.
- 1.7 Sponsorship of retirement, birthday or other company parties by supplier or customer of the senata-group or their subsidiaries is not allowed. Similarly, neither an employee nor an employee on behalf of the company should solicit or accept supplier participation in charitable or quasi-charitable endeavours. Such participation could introduce variables other than cost, quality and performance into the supplier selection process.

- 1.8 Employees may take advantage of discounts and other promotions offered by suppliers or customers, provided such discounts are available to all senata-group employees or their subsidiaries. Perks that have been solicited or bargained for obtaining or providing goods or services and only offered for the benefit of individuals or to a limited group of employees are prohibited.
- 1.9 Employees and their families should never solicit gifts or accept other personal benefits from suppliers or customers. Promotional material and other items of value up to € 30 or less may be accepted if made voluntarily and there is no reasonable likelihood the gifts will influence an employee's judgment or actions in performing their duties. Gifts above this value should not be accepted and the giver should be advised of the senata-group policy.

2 Offering favours to business partners

It is not permitted to grant business partners, especially suppliers, customers and their employees' payments, loans or non-cash benefits of any kind for their personal benefit in order to obtain more favourable terms of delivery, orders, etc. This request must be firmly rejected.

3 Outside activities and donations

Employees may not serve on executive board, boards of directors or advisory board of companies operated for profit without the senata-group's approval.

Employees may not engage in recurring private business activities that conflict with the legitimate interests of the company or interfere with the senata-group or their subsidiaries duties and may not, without prior approval, work or otherwise perform services for business partners or competitors.

In their personal capacities, employees may participate in non-profit organisations such as associations or citizens' initiatives. This engagement may not conflict with the legitimate interests of the company.

4 Share ownership

senata-group employees and their families may not participate, without prior approval, directly or indirectly in companies which maintain or seek ongoing business relationships with the senata-group. Excluded are investments which may not affect the activity in the senata-group.

V. Internal control

Employees may use company property only for purposes related to their job responsibilities. Employees have the obligation to protect corporate property against loss, theft or abuse. Confidential information (company and operational secrets) are to be held in the strictest confidence during, as well as after, an employee's term of employment.

Employees must follow the company's use, access and security guidelines for software and information technology, e-mail, internet/ intranet and voice mail systems. Moreover, personal data protection rights, including in-house, must be strictly observed.

VI. Commitment to high ethical standards

The senata-group is committed to achieving high ethical standards in business transactions.

The senata-group does not tolerate unethical or corrupt practices by its employees or on the part of our business partners.

The senata-group strictly forbids engaging in or tolerating bribery or any other form of corruption.

VII. Relationships with competitors and business partners

The senata-group is committed to complying fully with all applicable antitrust and trade laws and related laws pertaining to fair pricing, fair competition and consumer protection. These laws regulate senata's relations with its competitors, suppliers and retail customers.

They generally prohibit agreements and other activities that fix or coordinate prices or price formulas, divide sales territories or customers or restrict free and open competition in an inadmissible way. The laws also restrict the company's ability to share proprietary or competitively sensitive information and to deal exclusively with suppliers or other business partners. They also establish requirements for consumer disclosures and the resolution of customer issues.

In collecting information about its competitors, the senata-group utilises all legitimate sources, but avoids any actions that are illegal or could cause liability to the company.

VIII. Political orientation

The senata-group preserves the principles of social market economy. The senata-group decidedly rejects extremist ideas from both the right and the left margin.

IX. Environmental protection

The senata-group is dedicated to protecting the environment for current and future generations and to complying with all applicable environmental laws and regulations. The company expects and encourages its employees to act in an environmentally conscious manner. The company expects and encourages the active support and participation of its employees in pursuing new products and manufacturing technologies that promote resource conservation, facilitate recycling, eliminate pollution and preserve the natural environment.

X. Consequence of violation

Violation of the senata-group business conduct guidelines may result in disciplinary action, lead to the termination of employment and other legal actions.

All senata-group supervisors and management personnel are responsible for ensuring that all employees are familiar with the contents of the senata-group business conduct guidelines and that they obey the rules. Failure to fulfill these responsibilities may also subject a supervisor or manager to disciplinary action and legal consequences.

The senata-group reserves the right to change and interpret the rules of the senata-group business conduct guidelines.