



# Code of Conduct

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Table of Contents

I.	General principles	3
II.	Scope, implementation in the company and contact persons	3
III.	Social manners	4
IV.	Gifts, invitations and other personal benefits	4
V.	Prohibition of instructions contrary to compliance	5
VI.	Related Party Transactions and Private Business Transactions with Customers, Suppliers and Business Partners	6
VII.	Equity Participation in Business Partners' Companies	6
VIII.	Donations and Sponsorship	7
IX.	Occupational health and safety	7
X.	Fair Competition, Compliance with Antitrust Law and Prevention of Corruption	7
XI.	Prevention of Money Laundering	8
XII.	Information Handling, Confidentiality, Data Protection and IT Security	8
XIII.	Environmental protection	9
XIV.	Central contact person of the senata group	9

## I. General principles

The companies of senata Group (hereinafter also referred to as "senata") are committed to socially, ethically and ecologically responsible corporate governance. The integrity and good reputation of our company are also in the hands of our employees. In particular, honesty and fairness, compliance with laws and regulations, and protection of the environment for present and future generations must determine the way we deal with each other in the company as well as the way we deal with customers and business partners. It is important to prevent situations that could call into question the integrity of our conduct and to create framework conditions and control mechanisms that prevent, recognise and detect any threat to the integrity of our conduct as far as possible.

## II. Scope, implementation in the company and contact persons

This Code of Conduct applies to all companies in the senata Group, in particular all subsidiaries of senata GmbH, whether directly or indirectly affiliated.

The individual companies shall ensure its implementation and that no employee suffers any disadvantage as a result of compliance with this Code of Conduct. The managing directors are responsible for implementation and compliance in their companies. Managers are to be involved in their special function as role models. They shall have their actions measured against the Code of Conduct to a particular extent and shall be the first point of contact for questions with regards to understanding the rules and ensuring that all employees know and understand the Code of Conduct.

The companies must create suitable framework conditions for compliance with this Code of Conduct and set up control mechanisms to recognise, uncover, prevent as far as possible and, if necessary, eliminate any threat to integrity.

In particular, a compliance officer who is independent of instructions must be appointed to ensure that all employee concerns are dealt with objectively.

### III. Social manners

It is our concern to promote and maintain a working atmosphere based on trust and partnership by cultivating social and responsible behaviour. We regard equal opportunities as a matter of course. To this end, all employees must consider it their duty to prevent discrimination - including indirect discrimination - on the grounds of race, ethnic origin, gender, religion or ideology, disability, age or sexual identity. Behaviour such as bossing, mobbing, discrimination, harassment of any kind, violence or the threat thereof and other social misconduct will not be tolerated and will be stopped immediately.

This corporate culture of responsible and fair cooperation applies comprehensively, internally across all hierarchical levels and also externally. It must also shape our dealings with third parties (business partners, customers, authorities, public officials, etc.) and must be observed when selecting business partners.

### IV. Gifts, invitations and other personal benefits

Invitations, gifts, private business and financial transactions that could influence the decisions of employees and their work for the company are to be refrained from. This applies equally to both the acceptance and the granting of such gifts.

1. The acceptance and granting of monetary gifts or other financial benefits from or to third parties is prohibited, unless an exception is expressly made below. Monetary gifts or other financial benefits also include donations to a "coffee fund", the granting of discounts and price reductions on privately purchased goods or services, invitations to events and promotional gifts. Occasional promotional gifts of small value (up to EUR 30) are excluded from this if it is ruled out that the gift could influence the employee's decision.
2. Companies, public authorities or their employees who request gifts of money or goods or who offer gifts with a presumed value of more than EUR 30 must be reported to the

Compliance Officer. A gift that is subject to the prohibition of acceptance according to section 1 must be forwarded to the Compliance Officer together with any covering letter.

3. The Compliance Officer shall decide on the further use of the gift. It must be decided whether the gift is to be handed over to the authorities or can be returned to the donor. If both options are ruled out, the gift is to be disposed of and the proceeds donated to a charitable organisation.
4. Before accepting or granting invitations to customer events, recreational events and the like, the approval of the supervisor and the Compliance Officer must be obtained. The employee must be made aware of the possible taxable payment in kind of attending such an event.
5. Occasional hospitality is permitted within the usual limits (no luxury restaurants, no excessive alcoholic beverages, etc.). The employee must provide the Compliance Officer with information on the circumstances of the hospitality, the occasion, the inviting party and the location.
6. Requesting or granting any gratuity outside of the senata company's written contract with a business partner is not permitted.

### V. Prohibition of instructions contrary to compliance

It is forbidden to instruct subordinate employees to induce third parties, in particular customers, suppliers, public officials and/or politicians, to enter into business transactions with senata companies by granting personal benefits (bribery). If such instructions are nevertheless given, the following regulations shall apply:

- Subordinate employees are obliged and entitled to contact the Compliance Officer in this regard and to immediately and fully clarify the facts. Other employees are also entitled to inform the compliance officer.
- The senata company is obliged to react to this with appropriate sanctions against the superior.

- The rules of evidence of § 619a BGB apply accordingly in favour of the employees reporting such facts. Sanctions for reporting to the Compliance Officer are prohibited in any case.
- If employees fail to report the matter to the Compliance Officer in time, sanctions for the compliance violation may only be imposed on these employees if the senata company has previously sanctioned the superior who issued the instruction.

### VI. Related Party Transactions and Private Business Transactions with Customers, Suppliers and Business Partners

Employees are prohibited from acting for the company in their own affairs or in the affairs of persons close to them. In such cases, the employee must inform the supervisor, who will decide which employee will handle the business transaction for the company. Related persons in this sense are in particular spouses, non-marital partners, unmarried and registered partners, siblings, brothers and sisters of spouses or civil partners as well as relatives and in-laws in the direct line (e.g. parents, parents-in-law, grandparents, children, children-in-law, grandchildren). Unrelated persons can also be a related person for whom the relationship of proximity constitutes a conflict of interest if there are close personal or friendly contacts. In case of doubt, the supervisor must always be informed, who can consult the Compliance Officer if necessary.

Employees must inform their supervisor in case of private business transactions with customers, suppliers and business partners of the company, insofar as they are aware of the business relationship.

### VII. Equity Participation in Business Partners' Companies

Employees and their spouses and partners must notify the company management (personnel department) in writing of any equity investments in the companies of business partners and competitors. This duty of disclosure does not apply to the acquisition of marketable securities or pure investments which do not have any influence on the senata company.

### VIII. Donations and Sponsorship

Donations and sponsorship are fundamentally permissible forms of entrepreneurial activity for the companies of the senata group. Donations and sponsorship may only be made if they are in accordance with the provisions of this Code of Conduct. Support may be given to non-profit cultural, social, sporting, scientific, technical and ecological institutions, organisations and projects. Support for political parties is excluded.

The decision on the allocation of donations or the sponsoring of events is the sole responsibility of the management of the senata companies. The decision must be transparent and comprehensible and must be agreed with the Compliance Officer of the senata company.

### IX. Occupational health and safety

Occupational safety and health protection of employees must be considered as an integral part of all operational processes and must be included in the technical, economic and social considerations from the very beginning - already in the planning phase. Every employee should promote safety and health protection in his or her working environment and must comply with the regulations on occupational safety and health protection. Every manager is obliged to instruct and support his or her employees in the fulfilment of this responsibility. The same safety standards apply to employees of business partners as to our employees. This must be considered when selecting and working with them.

### X. Fair Competition, Compliance with Antitrust Law and Prevention of Corruption

Our actions are based on integrity and fairness in our dealings with our business partners and competitors, as well as compliance with all laws and legal regulations. Corruption, cartel violations, bribe payments, abuse of a dominant market position and similar behaviour to gain an advantage will not be tolerated (zero tolerance).

Employees should report such conduct by colleagues or business partners to the Compliance Officer. All information received will be treated confidentially. No employee who makes such a report in good faith may fear any disadvantages, even if the suspicion proves to be unfounded.

### XI. Prevention of Money Laundering

All applicable legal obligations for the prevention of money laundering shall be complied with and any involvement, either directly or indirectly, in money laundering activities shall be refrained from.

### XII. Information Handling, Confidentiality, Data Protection and IT Security

Intellectual property and confidential information embody an essential corporate value which must be preserved as a corporate value of the senata company and respected as a corporate value of our business partners. The protection of confidential information must be adequately met by means of suitable protective measures. In particular, confidential information must always be protected in a suitable manner from access and insight by unauthorised persons, i.e. on the one hand by employees who are not involved and on the other hand by other third parties. Furthermore, this protection must also be demanded from business partners.

Furthermore, all personal data, especially that of employees, customers and suppliers, must be protected. No personal data may be collected or processed without legal authorisation or the consent of the person concerned. This includes appropriate management and technical protection against unauthorised access.

Nowadays, where the use of the Internet and Social Media are part of everyday life, every employee has a special responsibility to ensure that the protection of data is always guaranteed and also that the reputation and standing of the senata companies are not damaged. In this respect, all guidelines on IT security and Social Media use must be complied with.



### XIII. Environmental protection

Protecting the environment for present and future generations and complying with all applicable environmental laws and regulations is a fundamental concern of the senata Group. In the development of new products and manufacturing technologies, as well as in the operation of production facilities, care must be taken to minimise any impact on the environment and climate.

Every employee has a responsibility to carefully utilise natural resources and to contribute to the protection of the environment and climate through his or her individual behaviour. This also includes the environmentally sound handling, collection, storage and disposal of waste.

Furthermore, the duty of care to promote responsible raw material supply chains and all applicable legal regulations on Conflict Minerals must be complied with.

### XIV. Central contact person of the senata group

In addition to the Compliance Officers of the senata companies, all employees and third parties (business partners, customers and suppliers, etc.) have access to the following

e-mail address of senata GmbH: [compliance@senata.eu](mailto:compliance@senata.eu)

which is available for questions about the Code of Conduct and for information about possible violations.