

Anti-corruption and bribery policy

SENSECA Group

Created by	Director ESG & Safety
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Gender Notice

For better readability, the generic masculine is used in this document. Unless otherwise indicated, the personal designations used refer to all genders.



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1. Introduction

One of the common values of the SENSECA Group is that we always abide by the law and act ethically and with integrity in respect of the general public and the environment.

Bribery and corruption, as well as the related improper conduct addressed in this Directive, are not only serious crimes and misdemeanours – they are also contrary to our values.

Such behavior can result in very high fines, legal and compliance costs for SENSECA, as well as civil liability and prison sentences for the individuals involved. It can also seriously damage SENSECA's reputation and market value.

This policy defines our responsibilities and the responsibilities of those who work for us in relation to bribery and corruption and provides information and guidance to those who work for us on how to identify and deal with bribery and corruption matters.

2. Definition of corruption and bribery

Corruption is the abuse of a delegated power, professional position or decision-making power, combined with the intention of obtaining an undue advantage.

Bribery (passive corruption) is defined as the offer, granting or acceptance of advantages (money or gifts) with which the bribe party pursues the aim of exerting undue influence on the decisions or conduct of the recipient in order to obtain a personal advantage or otherwise secure a business advantage.

2. Scope

This policy applies to all SENSECA companies and their employees, as well as individuals working for us or on our behalf at all levels, including temporary workers, consultants, contractors, temporary workers and temporary workers, third party service providers, agents or other persons associated with us.

It also applies to every business transaction, to all business partners, authorities and third parties, as well as to all intra-group transactions.

"Business Partner" means any company, association or person with whom SENSECA has or intends to enter into a business relationship.

SENSECA will consistently prosecute and appropriately punish violations of this policy.

3. Aim and purpose of the Directive

This Anti-Corruption and Bribery Policy specifies various principles of conduct in accordance with the "Code of Conduct of SENSECA. The purpose of this guideline is to sensitise all employees to the risks of corruption and bribery and at the same time to provide guidance and assistance in preventing and combating corruption, in particular in connection with the granting or acceptance of invitations or gifts in business transactions.

The purpose of this is to prevent damage to his company and the SENSECA Group that may arise from corruption or bribery or suspicion thereof.

This policy, together with the Code of Conduct, sets out the minimum standards for the SENSECA Group.

4. Dealing with Public Officials

The term "public official" refers to civil servants, judges, persons in a public office (ministers, notaries, etc.) or persons who perform public administrative tasks at a public authority. It also applies to employees of economically active undertakings if the undertaking is wholly or partly state-owned or controlled.

Since national and international laws are stricter in dealing with public officials, donations should be avoided as a matter of principle.

In order to be able to rule out corrupt behaviour in dealing with public officials in case of doubt, the following principles must be observed:

- Donations to public officials may only constitute financially low-value gifts that are legally unobjectionable and
- are customary according to custom and politeness (e.g. depending on the occasion, a customary SENSECA giveaway).
- In the case of invitations to public officials, it is imperative that care is taken to ensure that the catering is customary for the occasion.
- in the case of invitations to events, the public official should always be invited as a representative of his authority or in accordance with his or her mandates.

Most public institutions have their own laws and regulations that govern the acceptance of grants and invitations. Therefore, it is not uncommon for the acceptance of gifts or invitations to be refused.

If a public official is to be offered or granted a benefit, the consent of the responsible compliance officer must be obtained in advance.

If there are any doubts in dealing with public officials, every employee of SENSECA must first seek written advice from his or her supervisor or the responsible compliance officer.

5. Gifts and invitations

5.1. Giving and Promising Gifts or Invitations

Gifts to business partners and invitations to business partners by SENSECA employees are only permitted if they:

- are adequate,

- are cashless and of low value (max. €35 per employee per year) and
- comply with local law and customs.

If there is any doubt as to whether a gift or invitation to be granted or promised to a business partner is permissible according to the above criteria, any SENSECA employee who intends to promise or grant such a gift or invitation must first seek written advice from his or her supervisor or the appropriate compliance officer.

5.2. Requesting and accepting gifts and invitations

No employee of SENSECA may request gifts or invitations from business partners.

The acceptance of gifts from a business partner by a SENSECA employee is only permitted if the employee:

- are adequate,
- are cashless and of low value (within the exemption limit of EUR 35 per person per year) and
- comply with local law and customs.

If a SENSECA employee is invited by a business partner, the employee may only accept such an invitation if they

- is appropriate,
- cashless and
- local law and local customs.

If there is any doubt as to whether an invitation meets the above criteria, any SENSECA employee who intends to accept such a gift or invitation must first seek written advice from his or her supervisor or the relevant compliance officer.

tolerable if such services have a clearly defined business purpose and are transparent and appropriate.

6. Dealing with Agents and Advisors

Business cooperation with agents or consultants is quite common in practice.

Fees for agents and consultants are often suspected of concealing a corrupt donation.

In order to protect the interests of SENSECA in the best possible way and to prevent the appearance of corrupt behaviour in the first place, the following principles must be adhered to by all employees:

- The level of remuneration for consultants, agents and intermediaries must be proportionate to the value of the service provided and to the personal qualifications and must be in line with market standards.
- A written agreement is concluded for each type of cooperation.
- Agents and consultants working on behalf of SENSECA will only be paid upon presentation of appropriate proof of activity and time.
- Remuneration that is intended to be used to influence business partners or third parties is illegal and strictly prohibited.
- The use and selection of consultants, agents or intermediaries is decided on the basis of a transparent procedure.
- Payments may not be made in cash.
- Representatives and consultants working on behalf of SENSECA must strictly comply with national laws.
- The duration of the employment of consultants will be limited and subject to regular review.

7. Anti-corruption clause in contracts with business partners

As a matter of principle, the management of SENSECA must ensure that an anti-corruption clause is included in every contract with a business partner.

In the event that a business partner refuses to include an anti-corruption clause in the contract, an agreement must be reached with the relevant compliance officer and it must be ensured that the reasons for this refusal and, if necessary, the decision of the employee responsible for concluding the contract to nevertheless establish a business relationship are properly documented.

8. Effective date

This Code of Conduct comes into force on March 19, 2024 and supersedes all previous publications and regulations