

Code of conduct

SENSECA Group

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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

SENSECA's Code of Conduct provides guidelines for our day-to-day conduct. It regulates how we, as employees of the SENSECA Group, deal with each other as well as with customers, visitors, suppliers, authorities and all other institutions.

2. Our Values

2.1. Acting with Integrity

Our behavior is characterized by openness and mutual appreciation. We live our values: reliability, honesty and respect, credibility and integrity.

We take responsibility for ourselves, our company and society.

Our business activities take into account not only economic but also ecological and social factors.

2.2. Striving for continuous improvement

One of the most important ways to constantly improve ourselves is to innovate that really makes a difference. Our customers trust us to identify opportunities and help shape the future; to produce innovative products, services and solutions that address their most pressing needs.

2.3. Undertakings

Our Code of Conduct is binding. All managers and employees of SENSECA must adhere to its guidelines and principles.

The obligation to comply with the Code of Conduct arises directly from the applicable laws, company regulations, company guidelines and obligations arising from the employment relationship. Violations of the Code of Conduct may result in consequences under employment law.

Compliance with our Code of Conduct as well as legal provisions and internal company guidelines is an essential part of our company's appearance as a credible and reliable partner.

3. Responsibility towards people and the environment

3.1. Human dignity

Respect and protection of the dignity of every individual human being and their personal rights are a fundamental value of all the actions of SENSECA and its employees.

We respect human rights and are committed to respecting the laws and rules for the preservation of human dignity.

SENSECA treats its employees fairly, impartially and without prejudice and does not tolerate any harassment or bullying.

We do not tolerate any verbal or physical behavior that disrespects or humiliates another person. This also applies to visitors, customers, suppliers and anyone else we deal with.

3.2. Equal opportunities and anti-discrimination

SENSECA supports the fundamental rights of all people. We do not accept any kind of discrimination. This means that every employee can expect fair treatment and equal

professional opportunities, regardless of origin, ethnicity, religion, gender, physical limitations or sexual orientation.

We value our employees and their diversity.

We develop our employees and pay them fairly.

3.3. Occupational health and safety

SENSECA is committed to a healthy and safe working environment. We follow national health and safety laws and regulations, as well as our own rules and standards in this area.

The safety and health of our employees are an equally important corporate goal in addition to economic success.

3.4. Environmental and climate protection, sustainability

SENSECA is certified according to DIN EN ISO 14001, works efficiently and is constantly striving to improve the CO2 footprint of our business activities.

We carry out regular energy audits in accordance with § 8 EDL-G and DIN EN 16247-1.

The company determines the CO2 emission value, sets corresponding targets and implements measures for continuous improvement, such as increasing energy efficiency, the use of renewable energies and reducing gas and water consumption.

We promote resource efficiency and sustainable development.

Every employee is sensitized to environmental protection and bears responsibility for treating natural resources sparingly and contributing to the protection of the environment and climate through individual behavior.

Reduction of waste and its proper disposal, as well as responsible handling of hazardous substances, e.g. chemicals for humans and the environment, are further aspects of our environmental policy.

4. Compliance with laws and guidelines

Compliance with applicable national and international laws and regulations is an essential basic principle of our company's economic activity. This also applies to our internal company rules. Any violation of applicable law or internal policies and instructions may result in serious consequences of a criminal and/or civil nature.

5. Responsibility in dealing with business partners and third parties

5.1. Protection against corruption and bribery

We do not tolerate corruption or bribery. Our business relationships should be based solely on objective criteria. In addition to quality, reliability and competitive prices, this also includes the observance of ecological and social standards.

We are also committed to complying with relevant country-specific anti-bribery and anti-corruption laws and regulations.

5.2. Avoidance of conflicts of interest

As part of their employment, we expect integrity and loyalty from all employees. They act exclusively in the interest of our company.

In order to avoid conflicts of interest, private or own economic interests are always separated from the economic interests of SENSECA.

When it comes to personnel decisions or business relationships with third parties, only objective criteria count.

5.3. Fair competition

The companies and employees of SENSECA are obliged to comply with all competition and antitrust regulations of the countries in which we operate.

We welcome and promote free and open competition among market participants. SENSECA acts as a strong, but fair and legally compliant competitor.

5.4. Prevention of money laundering and terrorist financing

We actively prevent the risk of money laundering by carefully verifying the identity of customers, service providers, advisors and other third parties with whom we have or initiate business relationships.

In compliance with national and international laws, we ensure that transactions with third parties do not violate trade regulations such as economic embargoes, import and export control requirements, or applicable requirements to avoid terrorist financing.

5.5. Gifts to and from third parties

Employees of SENSECA may not at any time accept or demand inappropriate gifts or benefits or provide them (directly or indirectly).

Accepting hospitality from third parties or offering entertainment to third parties is only tolerable as a gift within the scope of the exemption limit of EUR 35 per person per year and only if such services have a clearly defined business purpose and are transparent and appropriate.

5.6. Protection of assets

We expect all employees to protect our company's business assets, including all tangible and intangible assets. This also includes intellectual property as well as all documented and mandatory internal processes, procedures, products and designs developed by our employees that are used in our company.

The business assets are to be used exclusively for corporate purposes. We also respect the intellectual property rights of third parties.

6. Responsibility in the handling of information

6.1. Privacy

The preservation of informational self-determination and the protection of privacy as well as the security of data processing are important concerns to us.

For this reason, we take all necessary precautions to ensure that the collection, processing and use of the personal data provided to our company is transparent, purpose-specific, comprehensible, careful and in compliance with the applicable legal provisions of data protection law.

We are committed to ensuring an appropriate standard of information processing so that confidentiality, integrity and traceability of sensitive information are ensured and unauthorized use is prevented.

6.2. Responsible Reporting

Our accounting and financial reporting are proper, correct, timely, complete and transparent in accordance with the relevant legal regulations and standards.

In addition, essential business processes must be adequately documented as part of an internal control system. This must ensure the complete and correct recording of accounting-relevant information.

6.3. Trade and trade secrets

Trade and business secrets of SENSECA and other sensitive business information must be treated confidentially.

Information is an important corporate value for SENSECA. They provide a competitive advantage and must be protected to avoid unwanted disclosures that could harm business operations, brands or other stakeholders.

It is a matter of course for SENSECA to respect the privacy of employees and others, including suppliers, customers and visitors.

The employees of SENSECA protect all intangible assets, in particular industrial property rights, as well as confidential information and trade secrets. This includes, but is not limited to, contract and pricing information, marketing plans, technical specifications and personal data.

6.4. Documentation

In order to prevent the appearance of incorrect or criminal conduct from the outset and to enable an examination of proper business conduct at any time, all business activities must be carried out responsibly and the documents must be kept correctly.

All business transactions must be properly and transparently documented, and records must be kept secure. The highest level of accuracy and completeness as well as a sense of responsibility are indispensable in all business processes.

7. Effective date

This Code of Conduct will enter into force on 1 March 2024 and supersedes all previous publications and regulations.