

Conflict of Interest Policy

SENSECA Group

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Gender Notice

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



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1. Introduction

A conflict of interest arises when the personal, social or financial interests of an employee, cooperating company or other organization collide (or even appear to collide) with the ability to act in the best interests of SENSECA.

All those involved in the company must assume their responsibilities to the company on the basis of what is in the best interest of the company, regardless of personal considerations or affiliations.

SENSECA adheres to the principle of avoiding situations that give rise to or threaten to create conflicts of interest and, to this end, takes measures that are as effective as possible to prevent the emergence of conflicts of interest.

All conflicts of interest must be disclosed and resolved in accordance with this procedure and in accordance with applicable laws and regulations.

2. Terms and definitions

A conflict of interest is a situation in which an employee or other business partner makes decisions or deliberately acts on behalf of the company in a way that benefits or could benefit himself or his business partners and in which the interests of an employee or business partner influence or could negatively affect his or her judgment, decision-making or the performance of his or her duties.

2.1. Potential conflict of interest

A potential conflict of interest is a situation that carries the risk of a conflict of interest.

2.2. Actual conflict of interest

An actual conflict of interest is a situation in which a conflict of interest already exists.

3. Purpose of this Policy

The purpose of this policy is to protect SENSECA's interests from harms that may result from actions of employees in situations where there is a risk of a conflict of interest or where such a conflict has already occurred.

The procedure also aims to ensure, through its provisions, the transparency of employees' actions and the motivation of their business decisions.

Conflicts of interest arise when business partners put their personal interests above those of the company and when these personal interests may influence their judgment, decisions or business activities in an undue way or give the impression that they are unduly influenced.

Judgments, decisions or actions in a conflict of interest can affect the objective performance of work for the company and have legal, reputational and regulatory consequences.

SENSECA respects the rights and decisions of its employees and does not want to interfere in their private lives. However, as part of their employment relationship, employees are contractually obligated to be loyal to SENSECA.

4. Scope of application

This policy applies to all employees, at all locations of SENSECA, including all international locations, regardless of their position, as well as to contractors, suppliers, consultants, agents and others acting on behalf of the company.

This conflict-of-interest policy applies in all countries where SENSECA does business, along with the need to comply with local laws. In the event of any disagreement due to conflicts between local laws and the principles contained in this document, the stricter rules must be applied.

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

5. Responsibilities

All employees, officers and directors of SENSECA and persons acting on behalf of the company, as well as persons doing business with the company, are required to comply with all laws regarding conflicts of interest.

Employees are prohibited from engaging in conduct that violates or may violate the Company's conflict of interest policy, or from permitting, or approving or tolerating the involvement of other employees. Persons in management positions bear both personal responsibility and responsibility for the employees under their authority.

A violation of this policy constitutes a violation of employee duties. If an employee violates the conflict-of-interest Policy, they will be subject to disciplinary action that may result in legal, civil, or disciplinary consequences, including dismissal, fines, and criminal liability under applicable law.

6. Compliance and Monitoring

The company ensures that measures are taken to inform employees and business partners about conflicts of interest and the consequences of violating them, supported by SENSECA's Code of Conduct.

New employees are instructed in the procedure when they start their new job and all employees are regularly instructed in the conflict of interest procedure as part of their Code of Conduct training.

The responsible supervisor is responsible for supervising the organization of the training courses and sending employees to the training courses in good time. It is also responsible for monitoring the effectiveness of this procedure, verifying its implementation and evaluating its suitability and effectiveness.

To this end, internal audits are carried out regularly by the Compliance Officer to monitor compliance with the conflict-of-interest policy and to detect and correct possible violations.

The Responsible Person will regularly monitor and evaluate the Company's conflict of interest policy to ensure compliance with applicable laws, industry standards and best practices. If non-compliance is found, the company takes appropriate corrective action.

The Compliance Officer is responsible for reviewing, updating and implementing changes to this procedure. Any changes made must be approved by management and duly communicated to all employees and business partners.



The Company has a procedure in place for reporting conflicts of interest or potential conflict of interest situations and investigating complaints. All complaints will be taken seriously and dealt with in a confidential, fair and lawful manner.

The company provides protection through the whistleblower system to employees who report a conflict of interest or a potential conflict of interest, so that they are not exposed to any form of discrimination, retaliation for the negative consequences due to their actions.

7. Review and update

The Company commits to a regular annual review and based on this review, will keep its conflict of interest procedure up to date to ensure that it is in line with applicable laws, industry best practices and the Company's needs.

Consequently, employees are informed through training after each update. If necessary, the company also declares the introduction of new procedures, tools or measures to support employees in their activities in the area of conflict-of-interest policy.

8. Applicable documents

- 1. Annex 1: Principles and Requirements / Guidelines
- 2. Appendix 2: Responsibilities at the SENSECA Group
- 3. Code of Conduct of the SENSECA Group (CoC)
- 4. Whistleblower Policy of the SENSECA Group

Date of coming into Force

This policy will come into force on 26 July 2024 and replaces all previous publications and regulations.

Date	Name	Title	Signature
26-07-2024	Jürgen Schneider	COO/CFO	

Annex 1: Principles and Requirements / Guidelines

The following are the key principles that must be observed and adhered to by all stakeholders:

1. Employees must assess for themselves whether a situation poses a potential threat or a risk of a conflict of interest.
2. If the employee is unsure whether there is a conflict of interest or a potential conflict of interest, he or she must consult with the appropriate supervisor to obtain information on the appropriate course of action.
3. Employees are obliged to report any actual, potential or alleged conflict of interest to their company supervisor immediately (as soon as they become aware of it).
4. Companies that work with SENSECA are required to update their declaration of interest annually or to disclose any conflict of interest or potential conflict of interest as soon as it arises.
5. Disclosures of conflicts of interest or potential conflicts of interest made during the recruitment process must be discussed by the recruiter before making an offer of employment.
6. Any conflict of interest must be clarified with the management in order to eliminate or reduce the associated risks. Most conflicts of interest can be resolved through an open dialogue between the parties involved in a simple and mutually acceptable way.
7. Failure to disclose a conflict of interest, incomplete or inaccurate disclosure, or improper management of a conflict of interest may constitute misconduct or a breach of the Conditions of Employment (in the case of employees) or the Conditions of Cooperation and may result in disciplinary action on the part of SENSECA.

Appendix 2: Responsibilities at SENSECA Group

The group specified below is responsible for the following:

1. Colleague

- Read, understand, and act on the requirements and regulations contained in the Conflict of Interest Policy in all markets in which the Company operates
- Participation in the required training courses based on the Code of Conduct
- Prevent, detect and report incidents of conflicts of interest
- To confirm or certify compliance with this policy upon request.

2. Managerial staff

- Read, understand and act on the requirements and regulations contained in the Conflict of Interest Policy in all markets in which the Company operates
- Complete all training on the procedures required to take on the role of a manager
- To take a strong leadership role and to promote a culture against conflicts of interest
- To confirm or certify compliance with the policy against conflicts of interest upon request
- Prevention, detection and reporting of conflicts of interest
- Ensuring compliance with the conflict of interest policy by employees and business partners
- Participation in the resolution of conflicts of interest and potential conflicts of interest
- Prompt response when a conflict of interest or the occurrence of a conflict of interest is reported, and sensitive handling of information disclosed by a colleague, especially with privacy in mind.

3. Third parties

- Read, understand, and act on the requirements and regulations contained in the Conflict of Interest Policy in all markets in which the Company operates
- Prevent, detect and report incidents of conflicts of interest
- To confirm or certify compliance with this policy upon request.

4. Compliance Parameters

- Update the requirements and records related to the Conflict of Interest Policy
- Training, informing and assisting employees to comply with the Conflict of Interest Policy and applicable conflict of interest legislation
- Maintain effective internal control systems and conduct regular audits to monitor compliance with the Conflict of Interest Policy and detect and correct potential breaches of the Policy
- Review, analysis and opinion on the approval of individual transactions or on cooperation with potential business partners with regard to the risk of conflicts of interest
- Screening of business partners, including suppliers, consultants and representatives, to identify and minimise the risk of conflicts of interest
- Establish compliance procedures and respond to escalations
- Prevention, detection and reporting of conflicts of interest

- Ensuring that employees who report conflicts of interest or suspected conflicts of interest are protected so that they are not exposed to discrimination, retaliation, or negative consequences as a result of their actions
- Conducting regular risk assessments of conflicts of interest, analysing potential risks and vulnerabilities in the company and implementing appropriate remedial measures and controls to reduce the risk of conflicts of interest.
- Responding promptly when they are informed of a conflict of interest or its occurrence and being sensitive to information disclosed by a colleague, especially taking into account data protection.