

**SEMPERIT** 

# CODE OF CONDUCT



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# Introduction

For more than 200 years, we have built on a strong know-how and competence in developing, producing, and selling highly specialized polymer products for the industrial and medical sectors. We continuously strive to advance in technical development and innovation, whilst also doing our best to protect the environment as well as the health, safety and well-being of our employees. Following high compliance standards in every aspect of our daily business is what makes the backbone of our company strong and resilient.

Our products are produced and used across the world, and we are proud that we hold a high reputation and trust amongst our network of international stakeholders. Our business partners expect us to provide optimum quality and maximum efficiency. We can only achieve this by creating a fair and impartial work environment, in which each individual takes responsibility to live by our values and contributes to create an environment in which ideas and talent can flourish. When we act with integrity, we build stronger trust and loyalty with our customers, suppliers, partners, regulators, shareholders, the public and other stakeholders.

The Semperit Code of Conduct guides us in our daily business and specifies, clearly and simply, what we expect of our employees and external business partners and how our leaders will behave in return. It serves as a foundation for Semperit policies, procedures and guidelines which provide additional

guidance on expected behaviors working across our businesses globally. Our words, behaviours and actions matter. We show our respect no matter where we are in the world, what our role or our profession is. Misconduct of any business and of any kind will not be tolerated and we expect all our stakeholders to adhere to national and international laws and act according to comparable guidelines, ethics and compliance principles.



As leaders, we are making commitments to our teams and we trust that, whether a Semperit employee or as a Semperit business partner, you speak up if you are not sure about something or you recognize that something is going wrong. In turn, we commit to listening to you, taking your views seriously and acting upon it with appropriate consequences. If you become aware of an issue that violates the Code of Conduct and poses a corresponding risk to Semperit, please report it to our whistleblowing system [Semperline](#).

We are committed to integrity. It is everyone's responsibility to understand the rules of this Code of Conduct and to comply with them in the course of business activities for Semperit. If you have any questions about the various contents, please contact your manager or the Semperit Compliance Team.

Thank you for your continuing support and your commitment to doing the right thing.

A handwritten signature in black ink that reads "Karl Haider". The signature is written in a cursive, flowing style.

**Karl Haider**  
CEO

## What is the Code of Conduct

The Code of Conduct is a practical guide for working together, being the best we can be, striving for a better working environment for all of us, while putting Semperit and our customers in the centre of our professional life.

### Attention

→ The Code of Conduct does not replace our personal judgement and ethics. It is up to all of us to stick to the rules and to behave ethically correctly within the company, with our business partners and on the market. We request the same ethical and compliant behavior from our business partners.



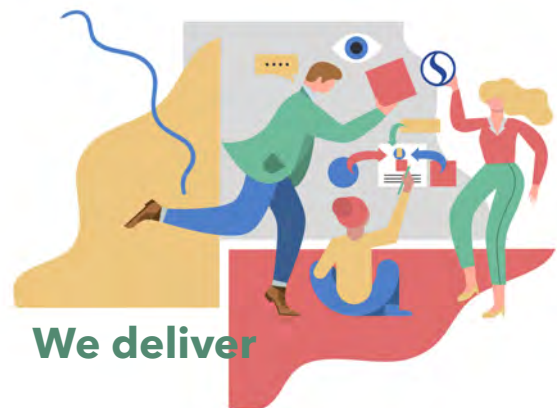
# Semperit Corporate Values

Our Semperit values are the core of the organisation. They represent the foundation on which we as Semperit are further developing.



We collaborate and appreciate each other no matter who we are and where we come from. We are loyal, communicate openly and respectfully. Being reliable in our actions and learning from mistakes, we build trust.

We develop smart and innovative processes and products that match our customers' needs. We add value by designing solutions - for today and the future. We encourage and embrace change.



We take responsibility and are dedicated to our tasks. We stand up for our common beliefs and have high expectations of our results. Passion drives us to make the difference.

It all begins with our customers. Our thinking starts from their point of view. We listen. And we deliver upon promised solutions and products. We are strong partners - internally and externally.

# The Compliance Principles

Our Compliance Principles can be understood as the protective shield around our organisation, with its people and its core values.

Based on our values and the Compliance Principles, the Code of Conduct creates mandatory basic rules with which we, as employees of Semperit, must comply and which we ask our business partners to observe.

It is our responsibility to get familiar with the content of the Code, to use the tools included and described, to “speak up” and ask for guidance for proper business conduct.

Proper training is a key element of our compliance system. We shall not hesitate to contact the Compliance Department for compliance-related inquiries as well as for reporting of violations.

A fully-fledged compliance system was defined and implemented, with the target to protect the company and our colleagues, while identifying and preventing unlawful or unethical behavior. Our compliance system is based on three pillars.

## Three Pillars of Compliance

### Prevention

Prevention starts with constant education and learning with the common goal to allow everyone to identify the pitfalls and to avoid them.

### Identification

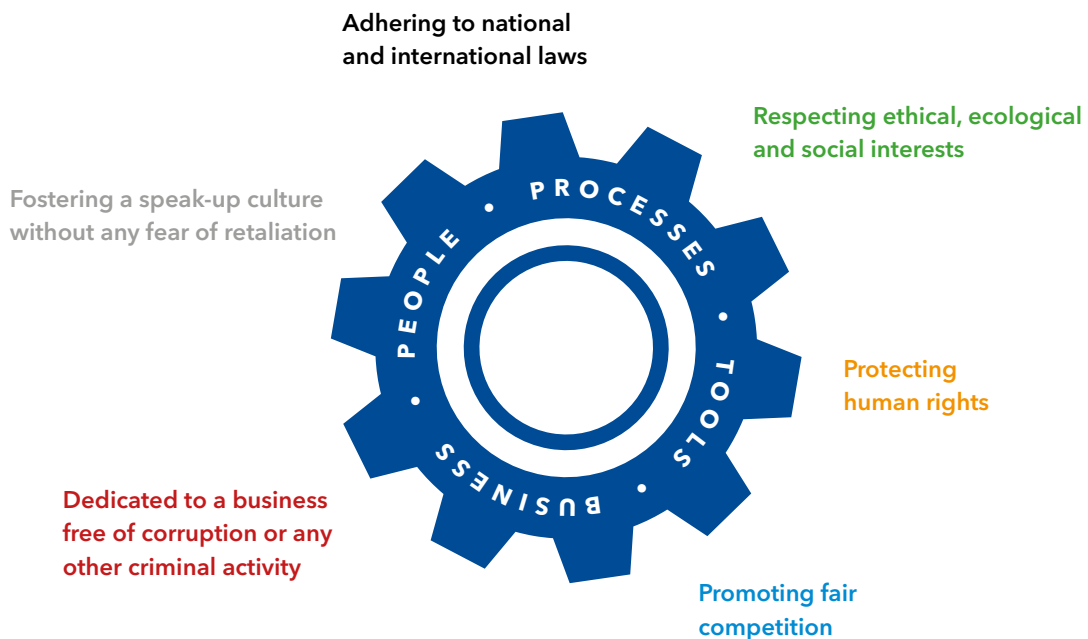
If the Code of Conduct has been or is being violated, it is our responsibility to immediately raise this with the appropriate person, such as your supervisor or the Group Compliance Officer (through: [compliance@semperitgroup.com](mailto:compliance@semperitgroup.com)) and/or through: SemperLine (our whistleblower system)

### Mitigation

The compliance team will focus on finding the best possible follow-up measures. The focus of such mitigation will always be the prevention of future risk for the group, its employees, customers and other stakeholders.

**i** For more details please read: [Integrity, Compliance Management System](#)

## The Six Compliance Principles



## Is the Code of Conduct Addressed to Me?

If you are an employee or similar (without distinguishing between leased personnel, freelance, contractor or similar), consultant or business partner, the answer is YES.

Please note that the role and the position in the company have no importance, as we have the firm belief that as part of Semperit we all have the responsibility to use our good judgement and to follow our Code of Conduct.

Furthermore, the Code of Conduct applies to all controlled subsidiaries and entities in which the company either owns a majority interest or manages operations. In addition, the principles of the Code are applicable to all our business partners (suppliers, customers, agents, distributors, consultants, etc.) and must be considered in our contractual relationships.

Semperit's employees will be asked sign the Code annually to confirm that they have read and understood the provisions of the Code of Conduct.

## Customer-focused Conduct

Semperit operates in the business-to-business segment. Our customers expect us to provide the quality and efficiency they need for their success.

In addition, we want our customers and business partners to adhere to the same high ethical standards and principles that we ourselves follow. We select our business partners based on quality and ethical standards and only work with reputable business partners. We may reserve the right to terminate contracts and seek compensation for damages if they do not fully comply with the law and, where applicable, with this Code of Conduct.

## Where Can You Go for Guidance (Semperit's Grievance Mechanism)?

It is crucial to understand that you are not alone. Semperit is fully engaged in supporting anyone who communicates in good faith the issues he/she encounters in the organisation. This is the only way, we can develop and grow sustainably. For advice, information or interventions please contact:

### **Managers and Senior Leadership in our Organisation**

They are available to answer questions as they are generally most familiar with the company's guidelines that apply to the business activities in your organisation.

### **The Human Resources Department**

Can explain and answer questions about our values, employment policies, benefits and workplace issues (harassment, bullying, mobbing, discrimination, etc.).

### **The Compliance Department**

Can help explain and interpret the Code of Conduct. Also, it will provide guidance regarding conducting business on behalf of Semperit in compliance with national and international laws and regulations. The Compliance Department will handle any issues and answer any questions related to competition law, corruption, fraud, terrorism financing and money laundering, conflict of interest, privacy – personal data protection, breach of ethical behaviour both within the company and within our business partners.

### **The Health, Safety, Environment and Quality (HSE-Q) Department**

Bears its responsibility in its name.

### **Semperline**

In case you do want to report an incident or violation anonymously, please use our whistleblower platform "SemperLine" which is accessible for employees as well as external parties. The Compliance Board will review all reports and determine appropriate measures.

The identity of a whistle blower will be kept strictly confidential. Semperit shall protect an one who speaks up in good faith from any retaliation measures, no matter which channels used.

Please contact:  
compliance@semperitgroup.com  
or [SemperLine](#)



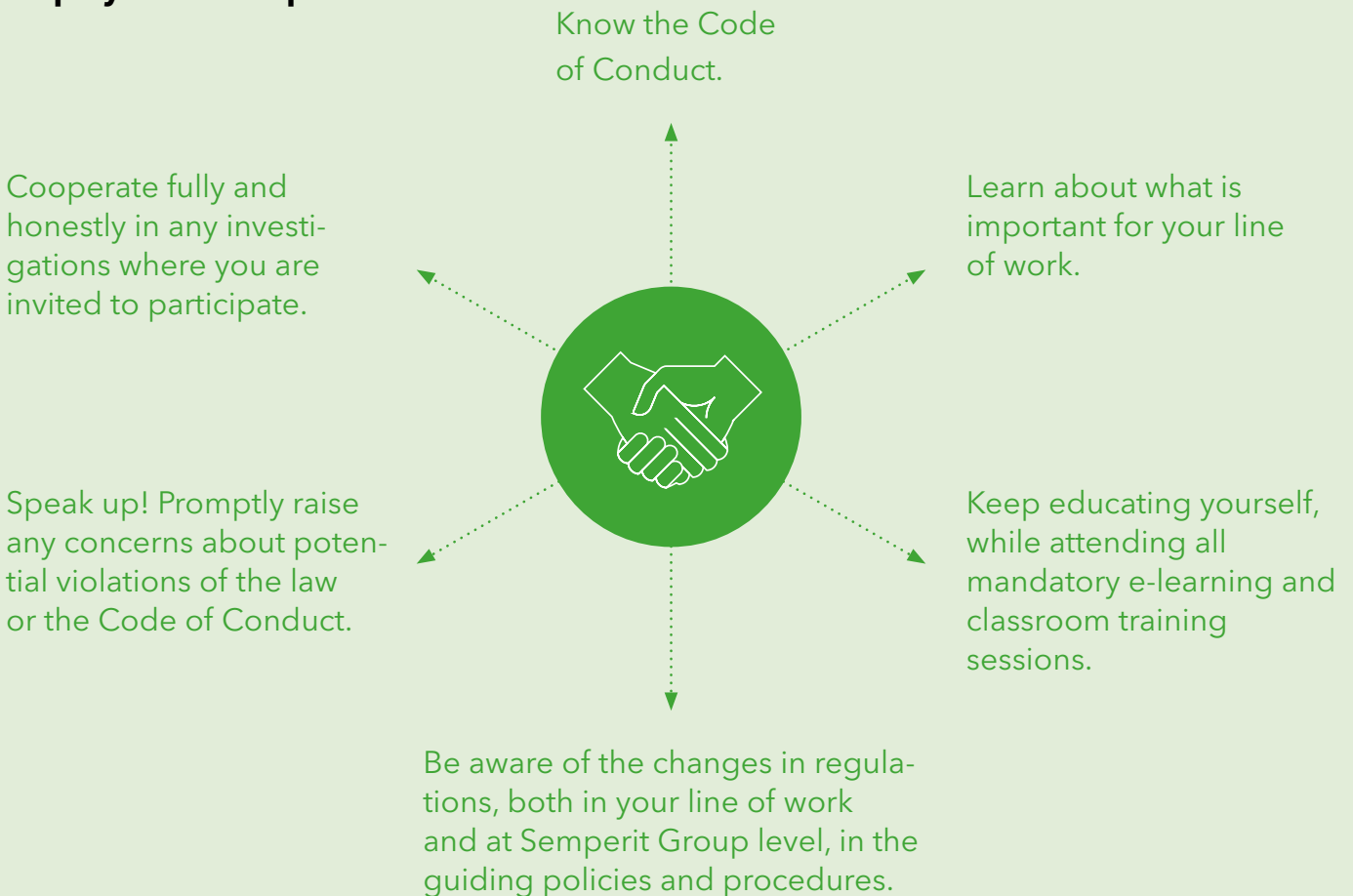
# Fair Play

Our activities are determined by integrity. Semperit observes the laws and regulations applicable to its business worldwide, as well as ethical framework conditions. Since some national laws are stricter than others, the Code of Conduct takes precedence over less strict rules.

All members of the Executive Board and all managers, directors, and other employees of Semperit must follow the Code of Conduct. Our suppliers and other business partners, especially when they are working on our behalf or are acting in our name, are requested to follow the Code of Conduct. Our business partners are encouraged to accept our Code of Conduct and adopt similar principles and standards. Violations of the Code of Conduct or of any law or regulation governing our business may have severe consequences for the individual concerned and for Semperit, and may also result in criminal or regulatory prosecution.

→ Ethical behaviour in the company and with our business partners is of great relevance and importance for Semperit. All compliance mechanisms we have in place are meant to identify any actions that contradict the present Code of Conduct and take corrective measures.

## What we must do as employees of Semperit







## Non-Discrimination

We at Semperit are committed to providing equal opportunities in employment. This means that we treat our colleagues and applicants fairly and never engage in any form of unlawful discrimination.

We follow all related laws (ILO Conventions Nos. 100 and 111, UN Convention on Discrimination Against Women) and include these standards in our employment decisions (such as recruiting, hiring, training, salary and promotion). We do not discriminate against individuals based on race, colour, gender, age, national origin, religion, sexual orientation, gender identity or expression, marital status, citizenship, union membership, political affiliation disability, veteran status, or any other legally protected factor.

## Harassment, Bullying, Mobbing

We are all dedicated to working together in an environment free from any type of abusive behavior.

Semperit prohibits any kind of harassment and bullying in any form - verbal, physical, or visual. If you believe you've been bullied or harassed by anyone in the company, or by a business partner, we strongly encourage you to immediately report the incident to your supervisor, Human Resources and/or Compliance. Similarly, supervisors and managers who learn of any such incident should immediately report the incident. Following the investigation procedure, the matter will be immediately, promptly and thoroughly investigated.

### What you should do as a leader in Semperit

Be a personal example of integrity, not just through words, but more importantly, through actions.

Consider employees' integrity contributions in the yearly targets.

Take immediate action in case of non-compliant behaviour.



Make sure that your team understands that business results should only be achieved by an ethical behaviour and in compliance with the Code of Conduct.

Create an environment in which every employee feels free to speak up without fear of retaliation.

Communicate the importance of compliance with sincerity and conviction at every appropriate opportunity.

## Drugs and Alcohol



Our position on substance abuse is simple: we don't allow it as it is incompatible with the health and safety of our employees. Consumption of alcohol is banned inside our premises, as it might lead to impaired performance or inappropriate behavior, endangers the safety of others, or violates the law. Illegal drugs in our offices or at any company event are strictly prohibited. If a manager has reasonable suspicion to believe that an employee is under the influence of drugs and/or alcohol during work, he may request an alcohol and/or drug screening. Reasonable suspicion may be based on objective symptoms such as the employee's appearance, behaviour, or speech.

## Global Diversity and Inclusion

Semperit is a great mixture of both global and local business, and thus diversity and inclusion are at the heart of our culture and are an important part of Semperit's success. For us, creating a diverse workforce and inclusive workplace is not only the right thing to do – it is a strategic business priority that fosters greater creativity and innovation. We gain our strength from diversity and we are dedicated to fostering a culture of inclusion in all aspects: gender, nationality, religion, age, sexual orientation and education.



# No Corruption

→ We, at Semperit, strive to do business with partners that have no compliance issues. Thus, we have in place a very clear business partner check process, meant to ensure that Semperit is a safe business partner.



We, at Semperit are aware that corruption can generally harm business and disrupt markets, and specially cause damage to our reputation. That's why we're committed to winning customers and business based on the quality of our products and services, and never because of bribery or any other illegal activity.

The direct or indirect offering, payment, soliciting or acceptance of bribes in any form is prohibited.

No payment (cash or otherwise) that could be interpreted as a bribe shall ever be paid to, promised to or accepted from an individual or organisation with the express or implied condition of gaining a commercial advantage.

Facilitation payments to influence an individual are also bribes and should not be paid.

## Public Officials

Particular restraint is required with public officials as well as state-owned enterprises. We will not allow any action, gifts or entertainment that could be interpreted as a bribe. This is especially true in any interaction with public officials.

## Political Contributions, Donations and Sponsorship

Semperit does not contribute (directly or indirectly) to political parties, organisations or individual politicians. A donation must fall within the legal limits.

Being a socially involved company, Semperit contributes to sustainability projects and develops state-of-the-art sustainability processes. We are transparent in providing corporate sponsorship and making charitable donations.

Donations and sponsorships require internal approval in advance and may only be granted on the basis of a written contract and in a form that guarantees tax deductibility. Reputation and objectives of the recipients have to be in line with our values and Code of Conduct.

## Third-party Payments

Third-party agents, consultants, distributors, or any other third-party representatives acting for or on behalf of Semperit (collectively, "third parties") are prohibited from making corrupt payments on its behalf. This prohibition also applies to subcontractors hired by third parties to perform work on Semperit's behalf.

## Gifts, Hospitality and Events

The perception of acceptance of a gift, hospitality, invitation to events (in the following referred to as benefits) is affected by factors such as proportionality, transparency, value, frequency.

Semperit has clearly established rules regarding accepting/granting benefits, as outlined in the Gift, Hospitality and Events Guideline.

Benefits shall be appropriate, customary and considered just a sign of high regard.

We are encouraged to decline any benefit if it is given with the intention to influence our behavior or decision. Offering such benefits with the intention to change the behavior or decision of the counterpart is forbidden.

Offering or accepting cash is strictly prohibited.



### For more details please read:

[Anti-corruption Guideline](#)

[Gifts, Hospitality and Events Guideline](#)

[Semperit Business Partner Check Guideline](#)

# Conflict of Interest

We, at Semperit are loyal and act always for the benefit of the company. Thus, professional decisions shall not be influenced by private interests or relationships. We should avoid situations in which a conflict between our private interests and our professional responsibilities may arise.

Neither an employee nor a member of an employee's immediate family should have business, financial or other relationships with Semperit, customers, suppliers, employees (present or prospective) or competitors that might impair, or appear to impair, the performance of the employee's responsibilities towards Semperit.

## Examples of conflict of interest situations:

### 1. Personal relationships

Supervising a friend, family member, or someone with whom you have a romantic relationship.

### 2. Financial interests

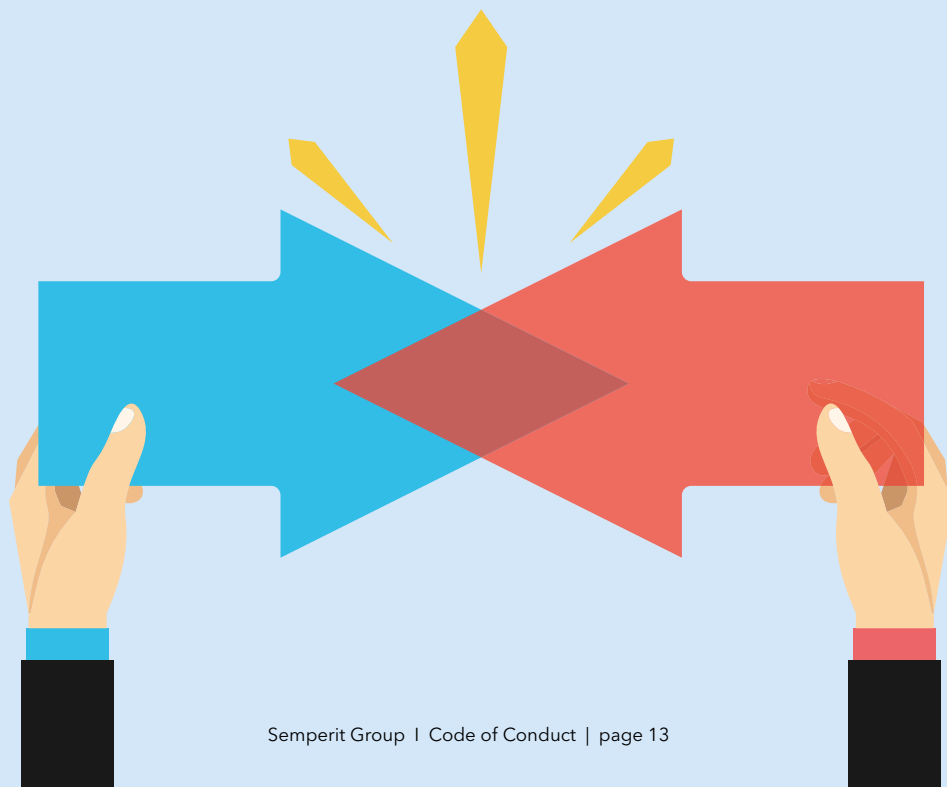
Investment in a company that does business with or competes with Semperit

### 3. Business opportunities

Taking an opportunity you learned about through your work at Semperit for yourself or starting a business that competes with our company. Introducing a family member as a possible business partner and influencing the decision on concluding such business.

### 4. Family members

Allowing a member of your family to receive improper personal benefits as a result of your position with our company. Employing a family member as your direct report or supporting the recruitment process in the favor of your family member.



# Prevention of Money Laundering

People involved in criminal activities like bribery, fraud, drug trafficking, counterfeiting or terrorism frequently use legitimate businesses to “clean” illegal funds. We must ensure that neither we nor our projects are used to launder money, including cash, traveler’s cheques, money orders or payments from third-party accounts.

We transfer money only for supplied and duly registered goods and services to natural and legal persons whose identities we know. We reserve the right to check the background of a business partner in case of new business relationships.

As employees of Semperit we will never

- make a payment to or accept a payment from an entity that is not part of any transaction or there is no business relationship
- accept payments in cash
- ship customer orders in a manner inconsistent with the Semperit standard procedures
- perform payments to companies or individuals without a lawful business reason

**i** For more details please read: [Semperit Business Partner Check Guideline](#)

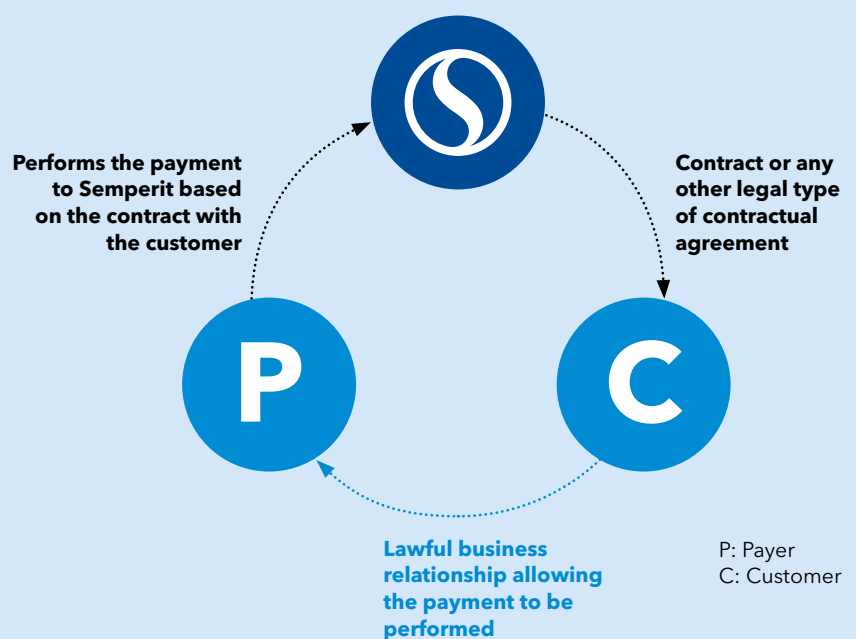
## Examples of money laundering attempts

1. Attempts by a customer to provide false information to open an account.
2. Offers to pay in cash or overpayments followed by requests for refunds.
3. Orders, purchases or payments that are unusual or inconsistent with a customer's trade or business.
4. Unusually complex deal structures.
5. Unusual fund transfers to or from countries unrelated to the transaction.
6. Transactions that might have been structured to evade recording or reporting requirements.

➔ **Any such situation has to be communicated to the Compliance and the Legal Departments.**

### Example from practical situations

The “sell-to-pay-to” situation appears when there is a difference between the customer to whom we sell and the entity that performs the payment. In such a case, we must be sure that there is lawful business relationship between the customer and the payer that allows the latter to officially and legally pay for the products.



## Insider Rules

Through our work, we may have access to substantial, non-public information about Semperit Group itself, its customers, competitors, or other third parties (i.e. some business plans not yet publicly announced, business secrets, etc.).

Some of these pieces of information may be considered "inside information" according to Capital Market Law: inside information is a precise piece of information which is relating to one or more companies or their financial instruments, is not publicly known and, if made public, would likely have a significant effect on the financial instruments' prices of these companies. Trading financial instruments (e.g. shares, bonds, etc.) of Semperit Group or potentially of other companies on the basis of such information as well as the recommendation to trade and the disclosure of that information are prohibited. It is a severe violation of the principles of Semperit Group for any employee to engage in such activities. Semperit Group has implemented a specific guideline on Capital Market Compliance.

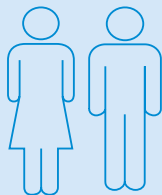
### Example: What is tipping?

Passing inside information along to anyone who may use it in a decision to invest, including family, friends, or third parties is also a form of insider trading known as tipping.

## Inside information



Potential business deals, or new markets



Potential changes in the management of Semperit



Any information that might have an influence on the market if made public



Potential new products



**For more details please read:**  
[Insider Compliance](#)

## Antitrust and Competition Law

### Antitrust

We are fully committed to complying with the antitrust and competition law regime in the countries where we operate. Coordinated behaviour, informal meetings or informal "gentlemen's agreements", possibly aiming at or causing a restriction of competition, are prohibited.

The appearance of such a business shall also be avoided. None of our employees may engage in any form of communication (written, electronic or verbal) with a competitor that attempts to:

- agree, fix, stabilise or control prices, credit terms, discounts or rebates (or other price components);
- share sensitive business information;
- allocate contracts, customers or territories;
- boycott certain customers or suppliers; or
- limit output or sale of any product or the scope of any service.

We are aware that we must act according to all competition laws valid in all territories where Semperit has business in order to preserve the good name of the company and avoid being sanctioned for any noncompliant behavior. We will not unduly restrict our suppliers or customers in their business dealings. We are dedicated to ensuring that we do not use commercial strategies that may abuse a dominant market position.

### Gathering Competitive Intelligence

To remain competitive is essential for us to obtain competitive intelligence, as a natural and necessary part of doing business. We are dedicated in gathering information responsibly and lawfully.

It is permitted to collect information from genuinely public sources:

- Information disclosed to the general public at trade shows
- Suppliers manuals
- Marketing brochures
- Newspapers and other mass media
- Analyst reports
- Trade publications
- Websites and press releases



**For more details please read:**  
[Antitrust Policy](#)

# Export Controls and Sanctions



Export controls and economic sanctions regulate where and with whom we can do business. Particular laws provide countries with legal control over the sale, shipment or transfer of goods and services across national borders including capital movements and payments. Export controls and sanctions may be imposed on countries, individuals or goods.

We must be aware of the potential impact of export control laws and sanctions and know which controls or sanctions may result in restrictions, prohibitions on how we conduct business and might lead to significant fines. We must be sure that we are dealing with business partners that are not affected by any sanctions or embargos.

In order to ensure business legality, our business partners are subject to a third-party due diligence process: Semperit Business Partner Check. It is in our interest and in the interest of Semperit to make sure that we are aware of any risks that might derive out of our business relationships and take the needed mitigation measures.



**For more details please read:**

[Principles of International Trade Restrictions](#)  
[Principles Business Partner Check](#)

# Fraud

We acknowledge that fraud, in any of its forms, is not tolerated at Semperit (United Nations Convention against Corruption).

Types of fraud:

**External Fraud:**

- Bills for work never done or improper done
- Hackers, phishing, social engineering
- Fraudsters pretending to be an executive of Semperit and asking for payments (CEO fraud)
- Fake payment instruction fraud

**Internal Fraud - Occupational Fraud**

- Misappropriation of company goods
- Embezzlement (theft or misappropriation of funds placed in one's trust or belonging to one's employer)

**Protection of Corporate Assets**

Our assets and resources should be used properly and only.

→ Remember - when it comes to payments, it is better to wait for a day and verify everything properly than to act too quickly and pay funds somewhere where they should not go.

We have full backing from the Executive Board not to release payments if they seem suspicious.



# Internal Control Rules

## Accurate Bookkeeping

We maintain books and records accurately reflecting our business and financial situation. All of us have a responsibility to record transactions honestly and handle our records with care.

## The Four-Eyes Principle

At Semperit the four-eyes principle is of crucial importance to ensure accuracy of transactions and transaction recordings. It is our responsibility to ensure that we apply this principle throughout all business processes and actions we execute on behalf of Semperit, internally and externally. All documents with a binding effect to any Semperit Group entity must be signed by at least two representatives.

## The Limits of Authority

We apply and follow the rules as set forth in the Limits of Authority (LoAs).

The LoAs define the authorisation limits for the different organisational levels when making certain business decisions within or on behalf of any legal entity of Semperit Group.

The LoAs cover the question of internal authorisation.

The LoAs apply to all business decisions within or on behalf of any legal entity of Semperit Group. The LoAs apply to all employees of Semperit and any other person who is entrusted with making the business decision within or on behalf of Semperit.

The LoAs shall be embedded in entity-specific Rules of Management.



## The Rules of Management (RoMs)

It is the obligation of every general manager of every entity of Semperit Group to have specific Rules of Management (following the respective Group Guideline) in place, specifying external representation (e.g. by signing a contract).

## Internal Control Systems (ICS)

An ICS has been implemented at all Semperit entities, independent of its segment, region or size. Consequently, respective internal controls must be adhered to, for all processes and by all employees, independent of any job grades. Internal Controls concern all. The general oversight, specifically with regards to ensuring effectiveness of internal controls, is under the supervision of Internal Audit.

However, it is everyone's obligation to use any of the communication channels to report any breach of any internal rules and regulations.

**i** For more details please read:  
[Limits of Authority](#)  
[Procurement Guidelines](#)

## Public Investigations



We support any public investigation, while being totally transparent both in the interest of the company and of the law. All details regarding such public investigations, or procedures in the frame of such investigations, are to be found in the dedicated Public Investigation Guideline.

**i** For more details please read:  
[Public Investigation Guideline/Dawn Raid](#)

## Information Security and Data Protection



All information regarding Semperit should concern only Semperit.

All such information is by default considered confidential and must be protected. The information must be approved for public distribution, and only then can be further transmitted.

We all have a responsibility to safeguard Semperit information and the confidential information of our employees, customers, and third parties.

Trade secrets and certain business information whose disclosure or loss would result in a substantial negative impact on our company, employees, third parties, and customers require additional protections such as encrypting the information. The IT Department will support you with the proper encryption tools and standards.

Thus, we are aware and respect all IT protocols and safety instructions.

Semperit protects personal data and our privacy. Thus, we treat all personal information in accordance with the General Data Protection Regulation, as it provides the strictest level of protection. It is our responsibility to mark as such all our private information stored on our devices, in accordance with the existing guidelines.

→ Our responsibility to protect Semperit information continues even if we decide to leave the company. In such a situation, we still have an obligation to protect Semperit information.

**i** For more details please read:  
[Data Protection Guideline](#)  
[End-User Guideline](#)  
[Mobile Device Guideline](#)

# Health, Safety, Environment and Quality

As a global company, Semperit adheres to the principles of sustainable economic development. Our philosophy regarding entrepreneurial responsibility is based on the ideas, values and principles of the company: it is imperative to demonstrate responsible behaviour and respectful interaction with each other, towards society and the environment. We act responsibly towards our interest groups - in every regional business unit and at every company location worldwide.

Semperit is aware of its responsibility to protect the environment and is committed to complying with applicable environmental laws and regulations. This applies to our products as well as our processes. We are committed to providing a safe and healthy workplace, protecting the environment, conserving energy and natural resources and preventing pollution by applying appropriate management practices and state-of-the-art technology. Semperit thus strives to keep its environmental impact as low as possible.

The economical and prudent use of natural resources is a high priority in all segments. Semperit also aims to reduce the consumption of raw materials and energy and to produce as little waste and scrap as possible.

Air, water and soil may only be utilised for commercial purposes within the scope of the approval granted by the responsible authorities. The same applies to the construction, operation, modification or extension of production facilities. Any illegal leakage of substances must be avoided.

Waste must be disposed of in accordance with the legal provisions. If services of third parties are used, it must be ensured that these also comply with the environmental regulations and our standards within the company.


Hazardous chemicals and other substances are at any time carefully managed. Semperit supports and complies with the objective of REACH (Registration, Evaluation and Authorisation of Chemicals), where applicable, which is in accordance with our own commitment to ensure responsible production, use and handling of the products we manufacture. Preregistration is a requirement for use of chemical substances during the transition period for the subsequent registration of them. As



Semperit is a downstream user, it is one of our key priorities to ensure that all chemical substances in use will be preregistered. We cooperate closely with national and EU platforms which provide recommendations for agreed action to conform to REACH instructions. This includes coordination with our customers and suppliers to obtain all required information about the chemical substances used in our products. Should you need further information, please feel free to contact us at [reach@semperitgroup.com](mailto:reach@semperitgroup.com). Our environmental standards also apply to our suppliers and business partners. We expect you to adhere to the highest possible standards and be aware of your footprint (material, energy, emissions and water), to be efficient and to comply with all legal requirements.

Health and safety are fundamental obligations that must never be compromised. Furthermore, we understand them as the driving force behind everything we do as Semperit. We, as employees, are the most valuable asset. Our skills, competence and creativity, and our willingness to accept change, have opened up new growth opportunities for our company. For Semperit, it is important that employees operate in a positive work climate in which each employee can develop his capabilities. We always prioritise safety and are committed to ensuring a healthy and safe work environment with appropriate measures to assess and decrease risks and to prevent accidents with the vision of "zero accidents". Semperit offers a health and safety plan, which corresponds to the common practice of companies of our kind. Furthermore, we ensure that appropriate health and safety information and training as well as personal protective equipment is provided to all employees. We aim to keep occupational injuries and illnesses to a minimum.

Our health policy is oriented towards improvement of the physical, psychological and social conditions of work. The company guidelines are laid down in the HSEQ policy of the Semperit Group.

 **For more details please read:**  
[Semperit Health, Safety, Environment and Quality Policies](#)

## External Communication

→ We communicate responsibly, and we are aware of the possible impact of such communication on the market.

As a part of Semperit, we may always be associated with the company whenever we express an opinion publicly - no matter if we are officially authorised to speak for the company or not. Our audience will often not care to distinguish between an official Semperit statement and an opinion expressed by a Semperit employee. Everything we say in public can have an impact on our company, our employees, our brand and also on us personally. Therefore, we need to be careful whenever we comment on controversial topics. Any activity in this context, as well as any information to be disclosed, must be coordinated with the Group Brand Management Department.

Only information classified as public may be disclosed to the outside world and only official company spokespersons and other official persons responsible are authorised to speak on behalf of the company.



## Social Media

Semperit respects everybody's right to use social media, but since social media activities are never entirely private, we must use these communication channels carefully. All activities must be consistent with our values and policies at all times no matter which platform (LinkedIn, Twitter, Facebook, ...) we use. We need to be careful whenever we comment on controversial topics on social media, such as religious or political matters. We must avoid postings which could affect our own image and the image of our company in a negative manner.

We keep in mind that contractual provisions, such as our employment agreement and the included obligation to secrecy, also apply on the social web. Company-internal data and information must not be shared on any social media channel. For this reason, we must never publish any information which is not intended for the public on our social media profiles.

We never handle any internal complaints or criticism, or conduct internal arguments publicly on social media sites. Instead, we coordinate such matters personally with our superior and/or our contact person, and use the Semperit communication channels (SemperLine).

Additionally, we take care to adhere to privacy and copyright laws. We do not publish any information (data, images, videos) to which we do not have the required rights. To use material (e.g. the logo) belonging to Semperit, we must obtain consent from Group Brand Management. The logo may not be used for private or commercial purposes.

If we feel that a certain question, topic or social media posting requires an answer from Semperit as a company, we do not reply ourselves, but direct this to the attention of Group Brand Management!

→ We follow the law and are aware that we are responsible for what we publish, so we must use good judgement. We understand that we never tolerate the use of social media to intimidate, harass, or discriminate against fellow employees.

**i** For more details please read:  
[Social Media Guidelines](#)  
[Classification of Documents](#)

# Speak Up!

It is our duty and responsibility to Speak up in case we are aware of any breaches of the existing Code!

## How do we Speak up?

We can address:

1. Our line manager
2. Compliance Department:  
[compliance@semperitgroup.com](mailto:compliance@semperitgroup.com)
3. Human Resources
4. [SemperLine](#)

### What happens when we speak up?

The cases are analysed by the Compliance team. The Compliance team informs the Compliance Board about the matter at hand and the possible approach. The Compliance Board decides how the matter will be approached. In some cases, an internal investigation will be initiated.

### Are we protected as whistleblowers?

Every whistleblower who speaks up in good faith is protected by Semperit against any kind of retaliation.

### Are confidentiality and anonymity maintained during an investigation?

Any investigation is based on the principles of confidentiality, professionalism, independence, competence, objectivity and impartiality, prevention of retaliation, and, where requested (e.g. while using the SemperLine), preservation of anonymity.



**i** For more details please read:  
[Guideline for the whistleblowing system SemperLine](#)  
[Report wrongdoing via SemperLine](#)

# Further Information

## **Semperit AG Holding**

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All references to people are gender neutral.

**SEMPERIT** 