

SEMPERIT 

CODE OF CONDUCT



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Introduction

For more than 190 years, we have built on solid know-how and competence in developing, producing and selling highly specialised polymer products for the industrial and medical sectors. We continuously strive to advance in technical development and innovation. Following high compliance standards in every aspect of our daily business makes our company's backbone strong and resilient.

The Semperit Code of Conduct guides us in our daily business and specifies the standards we place on ourselves and the expectations we hold for our external business partners. It serves as a foundation for Semperit's policies, procedures and guidelines, which provide additional guidance on expected behaviours working across our businesses globally.

Our words, behaviours and actions matter. We act with integrity no matter where we are in the world, or what our role or profession is. We also expect all our stakeholders to adhere to national and international laws and act according to comparable guidelines, ethics and compliance principles. When we act with integrity our customers, suppliers, partners, regulators, shareholders, the public and other stakeholders respond with stronger loyalty to and confidence in us.

We commit to this Code of Conduct, and trust that, whether you are a Semperit employee or business partner, you will speak up if you recognise that something is wrong. Misconduct in business of any kind will not be tolerated.

If you become aware of an issue that violates this Code of Conduct and poses a corresponding risk to Semperit, please report it using SemperLine, our whistleblowing system. You can file a report anonymously.

We are committed to integrity. It is everyone's responsibility to understand and to comply with this Code of Conduct in the course of business activities for Semperit. Please contact your manager or the Semperit Compliance Department if you have any questions about its contents.

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

The Executive Board
Semperit AG Holding

This Code of Conduct is our compass

Why do we have this Code of Conduct?

This Code of Conduct is the compass that guides our behaviour at work. It serves us as a reference point to make better choices on a day-to-day basis.

It gives us high-level guidance on our framework of policies, guidelines and instructions and supports us in defining a common ethical path. It sets clear standards and expectations on how to act and react.

→ **Doing business with integrity is our shared responsibility.**

This Code of Conduct sets principles, standards and ethical expectations that all employees and third parties acting on behalf of Semperit must follow.

It is not just a set of rules. It illustrates our values and principles, clarifies our mission and connects them with standards of professional conduct. It encourages our discussions of integrity and compliance and empowers us to manage ethical dilemmas.

It also helps us to locate relevant documents, services and other resources related to ethics within Semperit.

This Code of Conduct provides clear direction and a foundation for ethical decision-making. What is right and what is wrong.

Attention

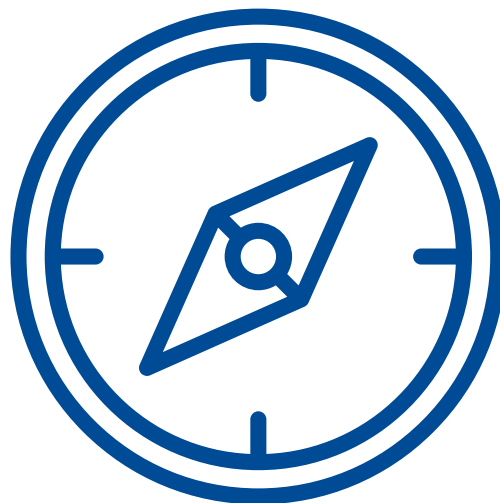
→ This Code of Conduct does not replace our judgement. It is up to all of us to follow the binding rules and regulations that apply within Semperit and all external business environments. We act with integrity. We expect the same ethical and compliant behaviour from our business partners.

Our commitment to responsible business conduct

We are committed to respecting international human rights standards, labour conditions and the environment and to combating corruption.

International conventions, declarations and guidelines support us in conducting ethical business:

- The United Nations' Universal Declaration of Human Rights
- The Core Conventions of the International Labour Organization
- The Modern Slavery Act
- The United Nations' Guiding Principles on Business and Human Rights
- The United Nations' Global Compact.



Semperit Corporate Values

Our Semperit Corporate Values are the core of the organisation. They are applied in our day-to-day work and reflect what the Semperit brand stands for: ethical business conduct at all times.



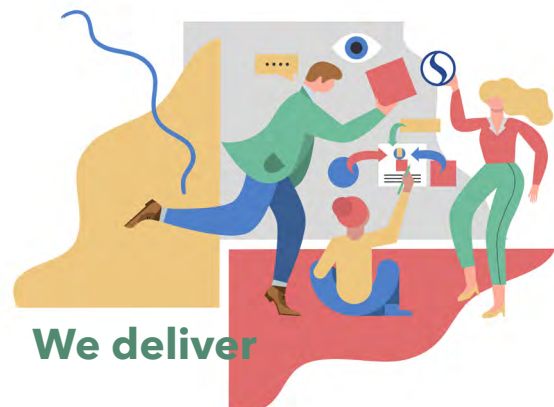
We collaborate and appreciate each other no matter who we are and where we come from. We are loyal and communicate openly and respectfully. Being reliable in our actions and learning from mistakes, we build trust.



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.

Is this Code of Conduct addressed to me?

Yes. This Code of Conduct applies to all our employees, leased personnel, freelancers, directors and members of the boards. The role and the position are unimportant. We all have a responsibility to use our good judgement and to follow this Code of Conduct.

This Code of Conduct applies to all controlled subsidiaries and entities in which the company either owns a majority interest or manages operations.

The principles of this Code of Conduct are also applicable to all our business partners (contractors, consultants, agents, suppliers, customers, distributors and others). They must be considered in our contractual relationships. Business partners

working on our behalf or acting in our name are requested to follow this Code of Conduct.

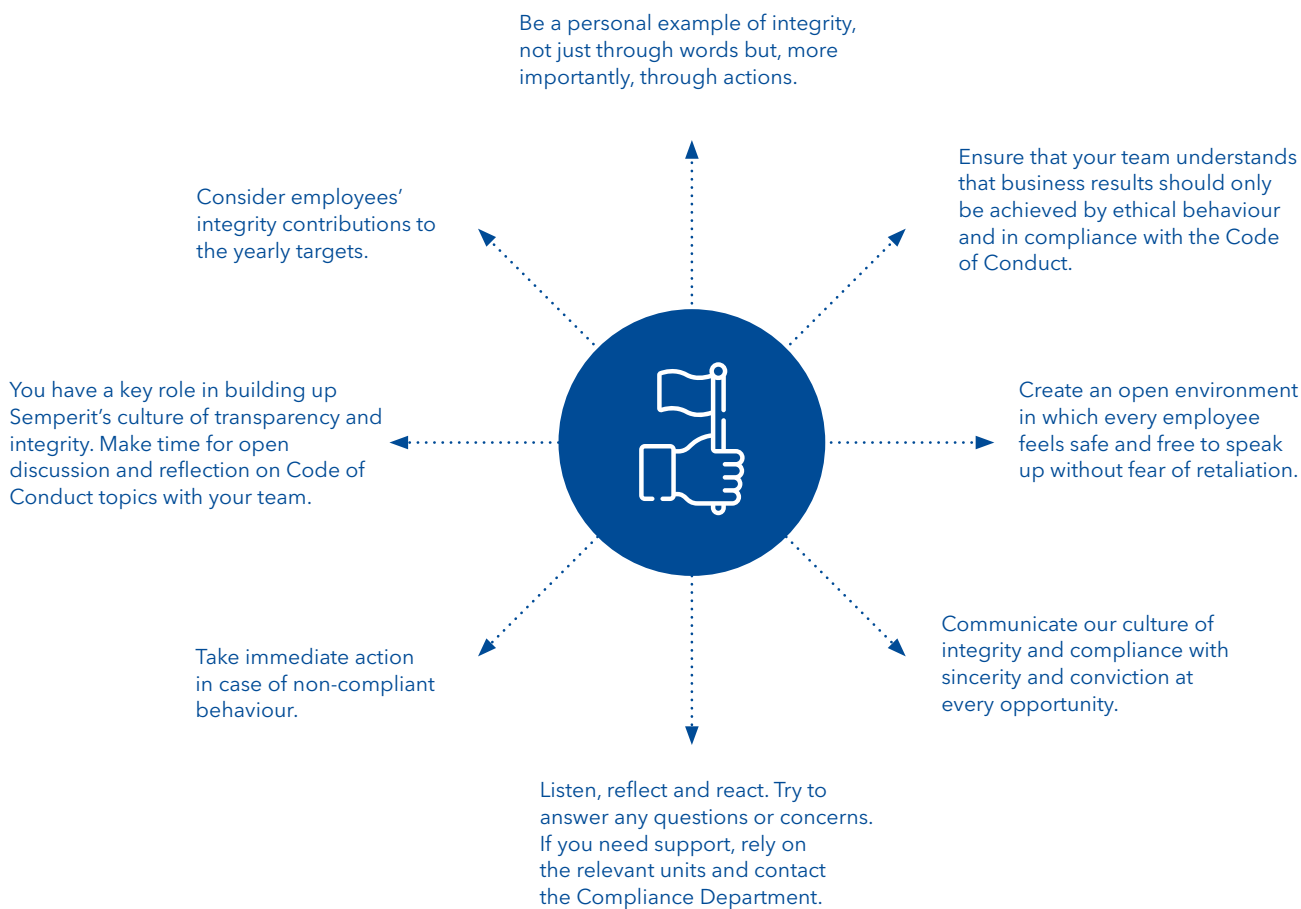
We will not accept violations of this Code of Conduct or our policies, guidelines or instructions. Consequences include disciplinary measures and even termination of employment. Also, beware that violations of any law or regulation governing our business may have severe implications for the individual concerned and for Semperit - and may also result in criminal or regulatory prosecution.

Speak up if you are aware of any concerns about, or violations of, our policies!

What is expected of me as an employee?



What, in addition, is expected of me as a leader?



If you are our business partner

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

We therefore expect you, as our business partner, to adhere to the same high ethical standards and principles that we follow.

We select our business partners based on quality and ethical standards and only work with reputable business partners. We reserve the right to terminate contracts and seek compensation for damages if you do not fully comply with the law and, where applicable, this Code of Conduct.

Our suppliers and other business partners are requested to follow this Code of Conduct, especially when they are working on our behalf or acting in our name.



Where can you go for guidance (Semperit's Grievance Mechanism)?

Do the right thing

React quickly if you witness or suspect non-compliance concerning this Code of Conduct or other policies. It is crucial to understand that you are not alone. Semperit is entirely engaged in supporting anyone who communicates in good faith the issues they encounter in the organisation. In this way, we can develop and grow sustainably.

Suppose you are concerned about potential misconduct or how we conduct business. In that case, you should, if feasible, reach out initially to your line manager, HR or the Legal Department. If you have more complex concerns, you can use the SemperLine whistleblowing hotline.

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 our organisation.

The Human Resources Department

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

The Compliance Department

Can help explain and interpret this Code of Conduct. Also, it will provide guidance regarding conducting business on behalf of Semperit in compliance with national and international laws and regulations. It will support you and answer any questions related to competition law, corruption, fraud, terrorism financing and money laundering, conflicts of interest, privacy and personal data protection, and unethical behaviour within the company or our business partners.

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

Can support you in explaining the Semperit Health & Safety, Environment, Energy and Quality policy.

The Sustainability Department

Can support you when you need guidance on how to follow our Sustainability Strategy and governance targets: managing of resources, and health & safety, environment, energy and quality.

→ At Semperit, we encourage everyone to speak openly and freely. We provide SemperLine - a secure and confidential channel to share concerns and questions when you cannot use other usual paths.



Speak up!

SemperBox – send us a letter

You can also use the SemperBox located in your production site. We will handle your case with the utmost care, preserving confidentiality and, if requested, anonymity.

SemperLine - secure whistleblowing hotline

If you want to report any wrongdoing, share any concerns or have any questions, and cannot use the usual ways of communication, you can use SemperLine.

You can use SemperLine at any time to report any wrongdoing, incident or violation towards yourself or others. "SemperLine" is easy to use, secure and confidential. It is accessible for employees as well as external parties, at any time. If you want you can remain anonymous but, if you choose to disclose your identity, rest assured that your report will remain strictly confidential.

If you are aware, or have knowledge, of any employee harassment, bullying, discrimination, malpractice, corruption, fraud, waste, abuse, misconduct or mismanagement, contact us!

i For more details, please read:
[Whistleblowing information](#)
[What happens when you submit a report?](#)



Business integrity and compliance

Business integrity and compliance are key elements of our Sustainability Strategy. Organisational integrity applies globally. We strive for the highest level of integrity in conducting our business.

Ethics and compliance are not a mere formality or just a risk management exercise. We perceive these as an opportunity to do good business and earn credibility and trust from customers, employees, vendors, shareholders and other stakeholders.

Based on our Corporate Values, business integrity and compliance principles, this Code of Conduct creates guidelines and indispensable basic rules with which we, as employees of Semperit, must comply and expect our business partners to respect and follow also.

It is our responsibility to familiarise ourselves with the content of the Code of Conduct, to use the tools provided, and, if needed, to ask for guidance on appropriate business conduct.

Appropriate training is a key element of our compliance system. We shall not hesitate to contact the Compliance Department regarding integrity and compliance-related inquiries, raising concerns or reporting violations.

A fully-fledged compliance system has been defined and implemented to protect the company and our colleagues, while identifying and preventing unlawful or unethical behaviour. Our compliance system is based on three pillars. We proceed from words to action and from action to change. Compliance brings transparency and enables us to make better decisions.

Three Pillars of business integrity and compliance

Prevention

Prevention starts within business departments where risks are identified and managed and continues with constant education and learning to enable everyone to identify and avoid the pitfalls. Business is accountable to implement policies, rules and regulations.

Identification

Based on risk assessment, audits, reports, and direct contact with internal and external stakeholders, the Compliance Department identifies open challenges. If this Code of Conduct, or any policies, guidelines, instructions, laws or regulations, are violated, it is our responsibility to immediately raise concerns with our supervisor or the Group Compliance Department (compliance@semperitgroup.com) and/or through SemperLine.

Mitigation

Based on identified open issues, the Compliance Department proposes mitigation actions and will focus on suggesting the best possible follow-up measures to mitigate future risk for the group, its employees, customers and other stakeholders.

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

The six group-wide compliance principles



Fair play

Integrity determines our activities. Semperit screens and complies with the laws and regulations that apply to its business worldwide – as well as all appropriate ethical framework conditions. Since some national laws are stricter than others, this Code of Conduct always takes precedence over less strict rules.

Ethical behaviour in the company and with our business partners is highly relevant and important for Semperit. The compliance mechanisms that we have in place will enable us to identify any actions that contradict this Code of Conduct and to take corrective measures.

Business agreements and transactions should be conducted transparently concerning our business partners’ roles and responsibilities, with clarity and disclosing transaction documentation. Semperit conducts its business relationships with its agents, suppliers and customers fairly and complies with applicable laws and regulations.

Good decisions serve the needs of the business without harming anyone. This applies to employees, business partners, shareholders and society itself.

All business transactions and related activities shall be conducted with integrity and the highest ethical standards.

Note

→ Fairness is the ability to make judgments that are free from discrimination and dishonest decision-making.

Human rights

Without exception, Semperit opposes child and forced labour and stands for fair wages, freedom of assembly and freedom of expression. We do not tolerate discrimination, harassment or violations of corporate principles, regardless of where in the value chain they occur. Information, training and corrective actions will ensure that the highest social standards are practised everywhere, and that respect for and protection of human rights is a top priority at all times.

The principles and guidelines of the Semperit Group apply not only to employees but also to suppliers and other business partners and are part of our [People Policy](#) and [Supplier Policy](#), which are publicly available on the Semperit website. They are a precondition for establishing and continuing business relationships. All business activities must be conducted in accordance with the UN Guiding Principles on Business and Human Rights and the core labour standards of the International Labour Organization (ILO), as well as in strict compliance with local laws.

Make the right decision!

i For more details, please read:
[People Policy](#)
[Supplier Policy](#)

The Semperit Principles



Discrimination against employees is not tolerated. Semperit provides equal opportunities.



Local laws regarding maximum acceptable **working hours** are observed.



Employees are hired based on written **employment contracts** and documented employment relationships in accordance with the law.



Care is taken to ensure appropriate and fair **remuneration** while taking account of local market conditions.



Child labour and other forms of **exploitation** of human beings are not tolerated.



The employees’ rights to **free formation of opinion** and expression are respected.

Social & labour standards

Semperit stands for the protection of human rights and for compliance with the highest social standards. This represents the core of our corporate culture and an important component when retaining existing employees and attracting new ones.

We strictly adhere to the local laws and regulations governing our business activities.

Child labour & young workers

We do not tolerate child labour or any other type of exploitation of people. The minimum age for employees shall comply with the national minimum age for employment, or the age of completion of compulsory education, whichever is higher (UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 & 79, ILO recommendation No. 146).

Prevention of involuntary labour and human trafficking

We do not accept the use of any form of illegal, abusive or forced and bonded labour or any kind of trafficking of human beings (ILO Conventions Nos. 29 and 105).

Social dialogue - freedom of association, dialogue, and co-determination

We support collective bargaining and the freedom of association. Thus, workers and employees shall, without discrimination, have the right to form, join and organise trade union(s) of their choice and to bargain collectively on their behalf with their employer (ILO Conventions Nos. 87, 98, 135 and 154).

Semperit complies with all regulatory requirements that serve to represent the interests of employees and give them a say in matters.

Fair wages and collective agreements (pay-scale agreements)

Semperit ensures remuneration in line with the market for all employees. Wages paid are based on the customary remuneration for a comparable position in the relevant environment. This includes the application of pay-scale/collective agreements at some locations.

Discrimination

Semperit does not accept any form of discrimination.

Harassment and abuse

Every employee shall be treated with respect and dignity.

Working hours

We ensure that local laws concerning the maximum permitted working hours are observed (ILO Convention Nos. 1 and 14).

Freedom of opinion and expression

We observe our employees' freedom of opinion and expression at any stage.

Suppliers

Semperit actively supports the observation of high labour and social standards by suppliers. Our principles are defined in the [Supplier Policy](#) of the Semperit Group.

i **For more details, please read:**
[Modern Slavery Act Semperit Statement](#)
[Supplier Policy of the Semperit Group](#)
[People Policy](#)
[Sustainability policies](#)



Non-discrimination

At Semperit, we 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). We 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 and bullying

We are all dedicated to working together in an environment free from abusive behaviour. Semperit prohibits harassment and bullying in any form - verbal, physical or visual.

Drugs and alcohol



Our position on substance abuse is simple: we do not 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 behaviour, endanger the safety of others or violate the law.

Illegal drugs in our offices or at any company event are strictly prohibited. If a supervisor or 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. Thus diversity and inclusion are at the heart of our culture and are an essential 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.

We are here to listen

If you believe you've been discriminated against, bullied or harassed by anyone in the company, or by a business partner, we strongly encourage you to report the incident immediately. Similarly, supervisors and managers who learn of any such incident should immediately report the incident.

We can help!

Speak to your supervisor, line manager, your local HR Team and/or the Compliance Department (compliance@semperitgroup.com). You can use the SemperBox post box or [SemperLine](#) to report harassment or discrimination. You can do so anonymously if you prefer.

Following the investigation procedure, the matter will be immediately, promptly and thoroughly investigated.



No corruption

→ We commit to only doing business with partners who do not follow questionable compliance practices. To ensure this, we have a very clear business partner check process, which helps us evaluate any relationship beforehand. Every employee who is accountable for a business partner must initiate the business partner check process and perform checks following internal rules and regulations.

We know that corruption, as the deliberate abuse of entrusted power for private gain, can harm business, disrupt markets, and especially cause damage to our reputation. That is why we are 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.

Never request, promise, give or accept any offerings that may influence your judgement or decision.

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, offered, or promised to, or requested 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, gift or entertainment that could be interpreted as a bribe. Pay particular attention when dealing with public officials, as even a small benefit may be perceived as a bribe or influence in decision-making. Observe internal rules and local law. Do not meet public officials alone.

Political Contributions, Donations, and Sponsorship

Semperit does not contribute (directly or indirectly) to political parties, organisations or individual politicians.

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. A donation must fall within the legal limits.

The graphic features the word "STOP" in large, bold, black capital letters. The letter "O" is replaced by a red circle with a diagonal slash through it, over a black handprint. Below "STOP" is the word "CORRUPTION" in bold, red, distressed capital letters.

Donations and sponsorships require internal approval in advance. They may only be granted based on a written contract and in a form that guarantees tax deductibility. The reputation and objectives of the recipients must be in line with our values and this 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 work on Semperit's behalf.

Gifts, hospitality and events

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

Semperit has established rules regarding accepting/granting benefits and recording given or received benefits as outlined in the Gifts, Hospitality and Events Guideline.

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

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

Offering or accepting cash or cash equivalents is strictly prohibited.

i **For more details, please read:**
[Anti-corruption Guideline](#)
[Gifts, Hospitality and Events Guideline](#)
[Semperit Business Partner Check Guideline](#)

Conflicts of interest

We are loyal and always act for the benefit of the company. Thus, professional decisions must not be influenced by private interests or relationships. A conflict of interest occurs when your private interests conflict with your responsibility to act in the best interests of Semperit. The term 'personal interests' may be private or may also arise from the interests of your family, friends or other organisations with which you are involved.

Neither an employee nor a member of an employee's immediate family should have any 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.

Conflicts of interest can be perceptual (you could appear to be influenced by a conflicting interest), potential (you could be in a conflicting interest) or actual (you are in a conflicting interest).

A conflict-of-interest situation is not always easy to identify. If prevented and managed appropriately, the situation can be controlled. It is essential to address all types of conflicts of interest. You need to properly document the steps to mitigate the conflict properly.

Why is it essential to prevent or manage conflicts-of-interest situations?

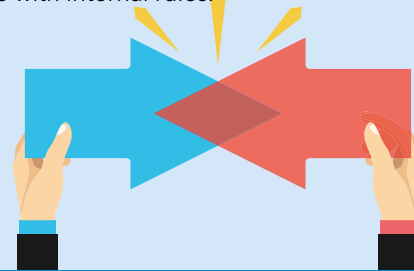
- Semperit might suffer from reputational damage.
- If you properly manage conflict-of-interest situations, you put Semperit's business before your private interests.
- If you do not manage these situations, accountability, sustainability and transparency are endangered.

How can you identify conflict-of-interest situations?

- You need to understand Semperit's mission, purpose and values.
- You need to review if your personal interests might somehow conflict with Semperit's interests.

How to react?

- Be transparent and act with integrity and diligence.
- Do not misuse your position for private interest or gain.
- Do not misuse Semperit information or share it outside the company.
- Disclose any perceptual, potential or actual conflict-of-interest situations and discuss them with your supervisor in line with internal rules.



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 favour of your family member.

Four steps to mitigate the conflict



Prevention of money laundering

Money laundering is an illegal process that criminals use to hide the illicit sources of their income. Their illegal activities generate large amounts of money that cannot be explained or hidden. If they want to use the money and avoid getting caught, they must legalise it. Therefore they “launder” the “dirty” money to make it clean and legitimate. They use complex techniques, transfers and transactions through numerous businesses to make it look like it comes from a legitimate source. We must ensure that neither we nor our projects are used to launder money, including cash, traveller’s cheques, money orders or payments from third-party accounts. All payments must comply with tax laws and anti-money laundering and anti-corruption regulations. We transfer money only for supplied and duly registered goods and services to natural and legal persons whose identities we know. We 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 business relationship;
- accept payments in cash;
- do business or take part in deals with unconnected parties;
- use unusual payment methods;
- accept unusual or extreme terms and conditions for conducting our business;
- ship customer orders in a manner inconsistent with Semperit’s standard procedures;
- make payments to companies or individuals without a lawful business reason;
- deal with criminals or suspects;
- falsify or destroy relevant documents.

Examples of money laundering attempts

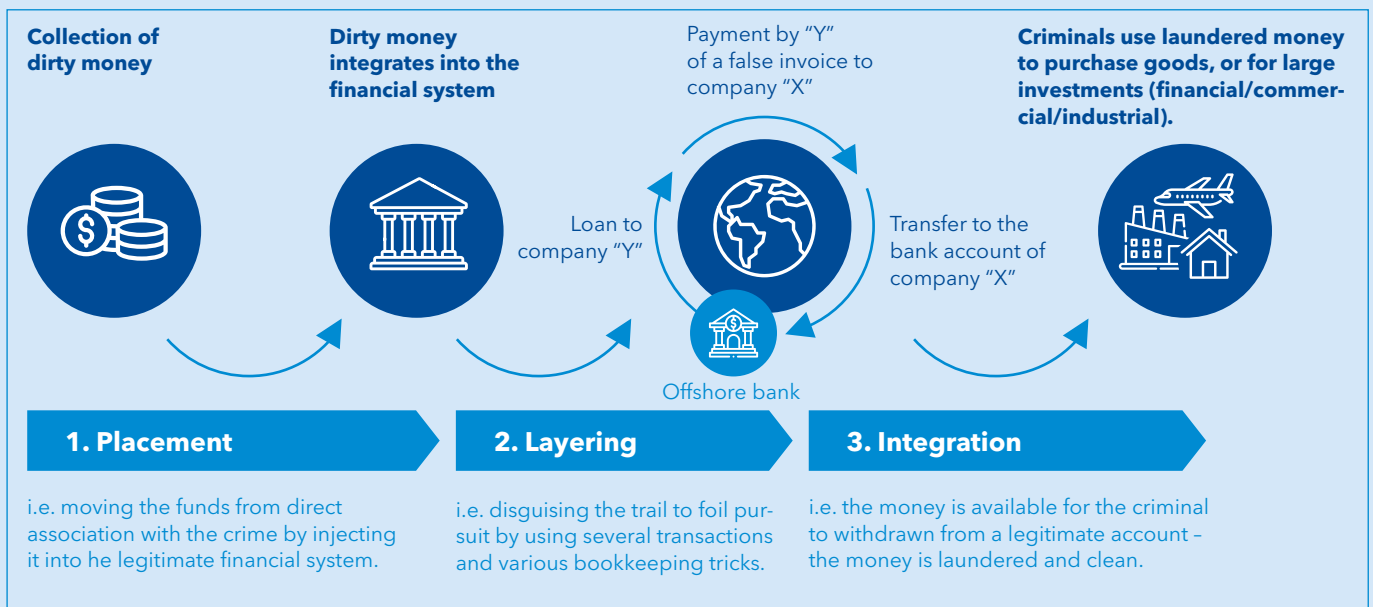
1. Attempts by a customer to provide false information to open an account.
2. Offers to pay in cash or overpayments followed by requests for refunds.
3. Orders, purchases or payments that are unusual or inconsistent with a customer’s trade or business.
4. Unusually complex deal structures.
5. Unusual fund transfers to or from countries unrelated to the transaction.
6. Transactions that might have been structured to evade recording or reporting requirements.
7. Making unusually large payments using cash equivalents (e.g., cashier’s checks and money orders).
8. Structuring purchases by purchasing products and then cancelling them.

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

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

Money laundering cycle

Money laundering may not involve all three stages, or some stages could be combined or repeated several times.



Insider rules

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

Some of these pieces of information may be considered "inside information" according to capital markets law: inside information is a particular piece of information which relates 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 prices of these companies' financial instruments. Trading financial instruments (e.g. shares or bonds) of the Semperit Group or of other companies based on such information and the recommendation to trade and the disclosure of that information is 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.

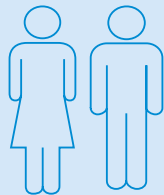
Example: What is insider tipping?

Passing inside information along to non-authorized individuals who may use it in a decision to invest, including family, friends or third parties, is closely related to insider trading. Tipping is illegal because the tipped-off person gains an unfair advantage over other investors before the information is made public. It is also a severe violation of Semperit's policies.

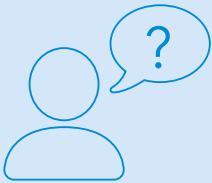
Inside information



Potential business deals, or new markets



Potential changes in the management of Semperit



Any information that might influence the market if made public



Potential new products

i For more details, please read: [Insider Compliance SemperLine](#)

Antitrust and competition law

Antitrust

We are fully committed to complying with the antitrust and competition law regimes 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 that are valid in all territories where Semperit has business to preserve our reputation and avoid being sanctioned for non-compliant behaviour. 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, we need to obtain competitive intelligence, as a natural and necessary part of doing business. We gather 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.

i For more details, please read: [Antitrust Policy SemperLine](#)

Export controls and sanctions

Export controls and economic sanctions regulate where and with whom we can do business. Particular laws provide countries with authority to control 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. We need to know which controls or sanctions may result in restrictions or prohibitions on how we con-



duct 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.

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

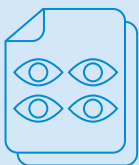
i For more details, please read:
[Principles of International Trade Restrictions](#)
[Principles Business Partner Check](#)
[Semperit Business Partner Check Guideline](#)

Fraud

We acknowledge that fraud, in any form, is not tolerated at Semperit. Fraud is an intentional deception, trickery or breach of trust to gain an unfair or illegal financial, political or other advantage.

→ 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 they should not go. Always double-check if the transaction requested is really valid. We have full backing from the Executive Board not to release payments if they seem suspicious.

→ **If you witness fraud, please Speak up!** Report it to your supervisor and to internal.controls@semperitgroup.com or (if financial fraud is involved) GroupTreasury.Vienna@semperitgroup.com - or to SemperLine, our whistleblowing hotline. In case of a suspicion, follow the procedure available on our [internal compliance site](#).



Always adhere to the eyes-principle when releasing payments - no payments to be authorised by one person only.



Strictly no sharing of security devices (electronic token, dongles, etc.).

Types of fraud

External Fraud

- bills for work never done or improperly 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

Is when you deliberately misuse or abuse Semperit's resources or assets for personal enrichment:

- misappropriation of company goods;
- embezzlement (theft or misappropriation of funds placed in one's trust or belonging to one's employer).

Fraudulent billing

- if an employee presents false invoices, claims or fictitious payments;
- we need to be aware if suppliers intentionally overcharge us or if the substitution of inferior goods and services occurs.

Procurement fraud

- when we purchase goods or services and our employee involved in the process has a hidden interest.

Protection of corporate assets
Our assets and resources should be used responsibly in line with internal policies.

i For more details, please read:
[Fraud detection and reporting](#)
[Limits of authority](#)
[Payment security guideline](#)

Internal control rules

Accurate bookkeeping

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

The four-eyes principle

At Semperit the four-eyes principle is crucial to ensure the 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. At least two representatives must sign all documents with a binding effect on any Semperit Group entity.

The Limits of Authority

We apply and follow the rules 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 business decisions within or on behalf of Semperit.

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

The Rules of Management (RoMs)

Every general manager of every entity of Semperit Group must ensure that specific Rules of Management (following the respective Group Guideline) are in place, specifying external representation (e.g. by signing a contract).

Internal Control Systems (ICS)

An ICS is implemented at every Semperit entity, 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 everyone. General oversight, specifically regarding ensuring the effectiveness of internal controls, is under the supervision of Internal Audit.

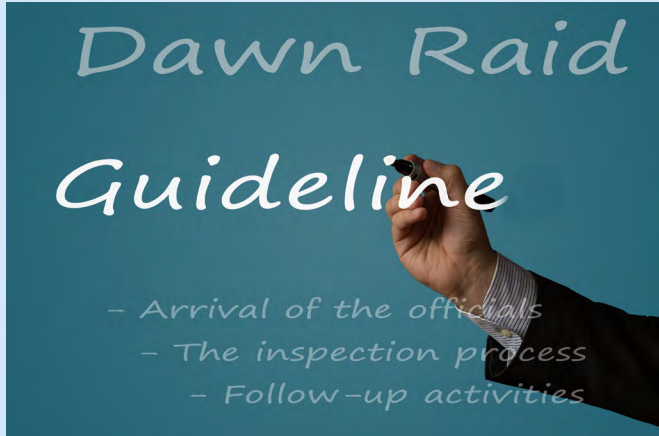
However, everyone must use any of the communication channels to report any breach of any internal rules and regulations.

Inform your supervisor and report to internal.controls@semperitgroup.com. You may also use SemperBox to post a letter or SemperLine to report online (a written report or a telephone call), or you may call (+43 1 79777240) or write an email to the Compliance Department: compliance@semperitgroup.com.

i For more details, please read:
[Limits of Authority](#)
[Procurement Guideline](#)
[Internal Controls Guideline](#)



Public investigations



We support any public investigation while being 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.

→ Our responsibility to protect Semperit information continues even if we decide to leave the company. In such a situation, we must continue safeguard Semperit information and must not share it with anyone.

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



Cyber security, data protection and sensitive information



All information regarding Semperit should concern only Semperit.

All such information is by default considered confidential and must be protected. Any information to be communicated externally must be approved for public distribution before further distribution.

We all are responsible for securing Semperit information and the confidential information and personal data of our employees, customers, and stakeholders. Only process personal data to the extent needed for your work obligations. Keep all personal data strictly confidential and handle it securely.

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 protection, such as encryption. The IT Department will support you with the proper encryption tools and standards.

We are aware of and respect all IT corporate quality guidelines, data protection, technical and organisation measures and cyber security policies, guidelines and instructions.

Semperit protects personal data and privacy. We treat all personal data and information following the data protection regulation and laws. It is our responsibility to mark as such all our private information stored on our devices per existing guidelines. You can report a data breach to data.privacy@semperitgroup.com and cybersecurity@semperitgroup.com.

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

Sustainability

We take responsibility for people and the environment

Our societies currently face several big challenges – first and foremost, climate change and its risks and consequences. The concept of a circular economy (or circularity) is the second-most important topic closely related to climate change; it concerns a range of topics such as selection of raw materials, use of resources and recoverability. But the questions to be solved do not just concern environmental parameters. They also concern the social consequences resulting from both climate change and the increased use of resources worldwide. Over and above the environmentally relevant challenges, and beyond complying with environmental laws and regulations,

Semperit pays attention to social challenges, which include ever-increasing inequality and the ramifications of demographic change, and initiates purposeful activities aimed at making a positive contribution.

Success in sustainability requires thinking holistically, developing awareness (including amongst all relevant stakeholders), and ensuring that no topic is put on the backburner. Our activities and solutions, as well as our products, serve to create opportunities for current and future generations.

i For more details, please read: [Sustainability](#)

Semperit's ESG guiding principles



Health, safety, environment and quality

As a global company, Semperit adheres to the principles of sustainable economic development. We demonstrate responsible behaviour and respectful interaction with each other, towards society and the environment, following our company's values, ideals and principles. We act responsibly towards our interest groups.

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 want to provide a safe and healthy workplace, protect the environment, conserve energy and natural resources and prevent pollution by applying appropriate management practices and state-of-the-art technology. Semperit strives to keep its environmental impact as low as possible.

The economic and prudent use of natural resources is highly prioritised in all segments. We aim to reduce the consumption of raw materials and energy and to produce as little waste and scrap as possible.

We utilise air, water and soil only as approved by responsible authorities. The same applies to the construction, operation, modification or extension of production facilities. We use our best efforts to avoid any illegal leakage of substances. (prior version: We, with all means, avoid any illegal leakage of substances.)

We dispose of waste by following the legal provisions. If services of third parties are used, we ensure that these comply with the environmental regulations and our internal standards.

At all times, we carefully manage hazardous chemicals and other substances. Semperit supports and complies with the REACH (Registration, Evaluation and Authorisation of Chemicals) objective, where applicable, to ensure responsible production, use and handling of our products. As Semperit is a downstream user, one of our key priorities is to ensure that all chemical substances are preregistered. We cooperate closely with national and EU platforms, which provide recommen-



Health



Safety



Environment



Energy



Quality

dations for agreed action to conform to REACH instructions, including 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.

Our environmental standards also apply to all our business partners. We expect our suppliers and business partners to adhere to the highest possible standards, to be aware of their ecological footprint (material, energy, emissions and water), to be efficient and to comply with all legal requirements.

Health and safety are fundamental obligations and must never be compromised. We understand them as the driving force behind everything we do at Semperit. We, as employees, are the most valuable asset. Our skills, competence, creativity and willingness to accept change have opened up new growth opportunities for our company. For Semperit, its employees should be able to operate in a positive work climate in which each employee can develop their 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 prevent accidents - with the vision of "zero accidents". Semperit offers a health and safety plan, which corresponds to the common practice of similar companies in the market. Furthermore, we ensure that appropriate health and safety information and training, as well as personal protective equipment, are provided to all employees. We aim to keep occupational injuries and illnesses to a minimum.

Our health policy aims towards the improvement of the physical, psychological and social working conditions of our employees.



For more details, please read:

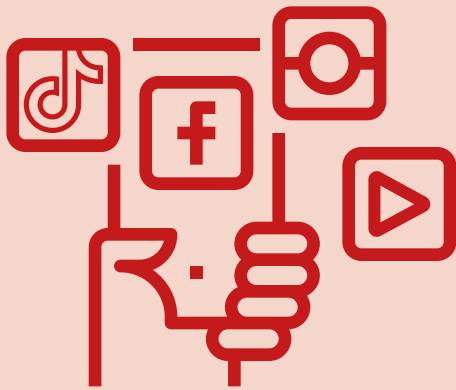
[Semperit Health, Safety, Environment and Quality Policies](#)

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 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 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 always be consistent with our values and policies no matter which platform (e.g. LinkedIn, Twitter, Facebook) we use. We must be careful whenever we comment on controversial topics, such as religious or political matters on social media. We must avoid postings that could affect our own image and/or the image of our company negatively.

We keep in mind that the contractual provisions, such as our employment agreement and the secrecy obligation that it contains, also apply to our activities on the social web. We must not share company internal data and information 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. Instead, we coordinate such matters 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 or 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. We may not use the logo for private or commercial purposes.

If we believe 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, and must therefore use good judgement. We understand that we never tolerate using social media to intimidate, harass or discriminate against fellow employees.

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

Speak up!

We expect all employees to adhere to our values, the applicable legal provisions, business integrity, this Code of Conduct and other internal guidelines, policies and procedural requirements. We can only avert damages to the company and its employees and business partners if compliance with the existing norms and regulations is upheld. Therefore, you are responsible for timely recognising irregularities or violations and immediately reporting them.

Semperit gives great importance to allegations reported by business partners, customers and other stakeholders.

Whistleblowing is an effective way to identify, detect and prevent corruption, fraud, bribery, misuse of funds and resources, and other malpractice.

How can I Speak up?

If you want to report any wrongdoing, share concerns or have questions and cannot use the usual ways of communication, you can use SemperLine (our secure web portal) or SemperBox (to post a letter), or you can email us at: compliance@semperitgroup.com.

You can use any channel to report any wrongdoing, incident or violation to yourself or others. If you want, you can remain anonymous but, if you choose to disclose your identity, rest assured that your report will remain strictly confidential.

You can be sure that we will handle your case with the utmost care, preserving confidentiality and, if requested, anonymity.

SemperBox – send us a letter

SemperBox is located on your production site. Access is granted only to local Compliance coordinators.

SemperLine – hotline

You can use SemperLine, our online secure web portal, to report any wrongdoings. "SemperLine" is easy to use, secure and confidential. It is accessible for employees as well as external parties anytime.

Send an email or call us

You can call our Compliance Department anytime or send us an email. You might decide to reveal your name that way. We will, in any case, ensure that your concerns or report remain strictly confidential and are handled appropriately.
Email: compliance@semperitgroup.com.

What happens when we Speak up?

The Compliance Department analyses the case, informs the Compliance Board about the matter and advises on a possible approach. The Compliance Board decides how to handle the case and might initiate an internal investigation. An internal investigation group is bound to confidentiality and to protection of a whistleblower against retaliation.

Are confidentiality and anonymity maintained during an investigation?

Any investigation follows the principles of confidentiality, professionalism, independence, competence, objectivity, impartiality, prevention of retaliation and, where requested (e.g. when using SemperLine or SemperBox), preservation of anonymity.

Are we protected as whistleblowers?

Semperit protects every whistleblower who speaks up in good faith against any retaliation. If you face any kind of retaliation, please contact compliance@semperitgroup.com immediately.

How do we Speak up?

You can address:

1. Your line manager
2. Compliance Department: compliance@semperitgroup.com
3. Human Resources Department
4. SemperLine - or SemperBox to post a letter



Where can I go for guidance?

Do not hesitate to contact us if you feel threatened or if somebody forces you to violate our policies or laws.

If you do not know how to act, ask your line manager or the Compliance Department (compliance@semperitgroup.com).



For more details, please read:

[Guideline for the SemperLine whistleblowing system](#)
[Report wrongdoing via SemperLine](#)

Further information

Semperit AG Holding

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All references to people are gender neutral.
References to internal documents and their links
are available only to internal stakeholders.
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