

Semadeni AG Code of Conduct

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1 Preamble

With this Code of Conduct Semadeni AG is committed to values such as integrity, fairness, sustainability and other important ethical principles. It serves to make all members of the company aware of their social responsibility towards their own company, its employees, customers, and suppliers as well as towards the environment and society. The Code of Conduct applies to the entire company and is the basis for all business relationships of Semadeni AG. It is based on the principles of the UN Global Compact, the ILO Conventions, the United Nations Declaration of Human Rights and UN Guiding Principles on Business and Human Rights, the United Nations Convention on Child Rights and the elimination of all forms of discrimination against women, the OECD Guidelines for international Businesses and the Code of Conduct for the German Federal Association for Materials Management, Purchasing, and Logistics (BME).

The aim of the Code of Conduct is to ensure that all employees in the company are aware of Semadeni AG's core values and follow them in their dealings with colleagues, customers, suppliers, and other stakeholders.

Semadeni AG expects its suppliers to also comply with the principles of this Code of Conduct and urges them to relay these principles to their own subcontractors and to promote their compliance in the best way possible.

2 General Ethical Principles

Article 1 Compliance with laws and regulations

Semadeni AG undertakes to comply with all applicable laws as well as other relevant national provisions in all business dealings and decisions. Provided that a production process, delivery or any other activity requires an official or other approval, the activity in question will not be carried out until the necessary authorizations have been obtained.

Article 2 Compliance with fundamental business principles

Semadeni AG business relations are based on honesty, fairness and mutually beneficial negotiations because Semadeni AG is convinced that these business principles lead to stable and sustainable business relationships. It accordingly expects its suppliers to act in a fair and transparent manner.

Article 3 Combating corruption and money laundering

Semadeni AG prohibits any kind of corruption. When dealing with business partners and state institutions, the interests of the company and the private interests of employees on both sides are to remain strictly separated. All entrepreneurial activities must be independent of irrelevant considerations and personal interests.

Semadeni AG and its employees are prohibited from offering, promising, soliciting, granting, endorsing or accepting any gifts, payments, invitations, services or other personal benefits throughout the course of business, which might improperly influence a business relationship or compromise the independence of business partners.

Gifts of low value as well as invitations to appropriate business meals and reasonable company events or from business partners within the scope of the applicable laws, usual hospitality, custom, and courtesy are permissible.

In particular, Semadeni AG also complies with the applicable international standards and laws relating to combating corruption, money laundering, and the financing of terrorism.

Article 4 Conduct towards competitors

Semadeni AG respects fair competition and fully complies with applicable competition protection laws (e.g. antitrust and other laws regulating competition). In dealing with competitors, in particular, collusion and other activities that affect prices or conditions, allocate sales territories or customers, or unreasonably restrict free and open competition are prohibited. Furthermore, Semadeni AG also prohibits any form of collusion between customers and suppliers that aims to limit customers' autonomy with regard to their resale prices and other conditions.

Article 5 Respecting trade secrets

Semadeni AG obliges its employees to respect the trade and business secrets of our business partners. Confidential information and documents are not disclosed or otherwise made accessible to third parties without explicit authorization.

3 Social Responsibility Principles

Article 6 Respecting human rights

Semadeni AG respects and promotes all internationally recognized human rights and is committed to the United Nations Global Compact Principles. Regular mechanisms for reviewing the impact of its activities on human rights have been implemented.

Article 7 Prohibition of forced labor

Semadeni AG strictly rejects any kind of forced labor. Forced labor is defined as any type of work or service that is assigned under threat of sanction in the event of undelivered results, or which is not performed on a voluntary basis. Migrant workers receive the same working conditions as those available to locally hired workers.

Article 8 Prohibition of child labor

Semadeni AG complies with national laws and the United Nations regulations on children's rights, and is committed in particular to the convention on the minimum age for employment (Convention 138 of the International Labor Organization) and the convention on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor (Convention 182 of the International Labor Organization).

Semadeni AG only employs young people under the age of 18 and over 15 (or if they have not yet reached the end of compulsory education) as apprentices or in the context of a temporary "summer job". Semadeni AG takes appropriate measures with regard to the particular vulnerability of young people.

Article 9 Discrimination is prohibited

Semadeni AG promotes fairness, gender equality, integration, and accessibility, is committed to being an open and diverse company, and undertakes to oppose any form of discrimination within the framework of applicable rights and laws. In particular, we do not tolerate any discrimination against individual employees (e.g., with regard to their employment, compensation, overtime, training, promotion, dismissal or transfer) on the basis of gender identity, race, skin color, ethnic or cultural origin, nationality and/or immigration status, disability, religion or belief, age, trade union membership, political views, marital status, pregnancy, or sexual orientation.

Semadeni AG respects the freedom of association and the right to collective bargaining and prohibits any form of intimidation, harassment, retaliation, or violence against union members and union representatives.

Semadeni AG completely refrains from gender or racial discrimination in marketing and communication measures.

Article 10 Health protection

Semadeni AG ensures occupational health and safety in accordance with applicable laws, industry standards and international standards and supports continuous development to improve the working environment. We inform our employees about the risks and dangers of working and provide them with safe and healthy working conditions. It has taken various measures to prevent accidents, injuries and work-related illnesses and to reduce the remaining risk to a minimum.

Article 11 Wages and working hours

Semadeni AG respects the right to freedom of association of its employees and ensures compliance with the applicable laws regarding minimum wages, compensation for holidays, leisure, and social benefits. Equal pay is taken very seriously by Semadeni AG. To ensure that all individuals performing

the same tasks receive the same wages and salaries, regular reviews are conducted using recognized methods. Our working hours comply with the conventions of the International Labor Organization and national legislation. Overtime is remunerated in accordance with legal requirements at the standard rate or with a supplement. There are no wage reductions for disciplinary reasons. In addition, Semadeni AG does not require advance payments or commissions for employment or work equipment.

4 Environment

Article 12 Commitment to sustainability and the circular economy

Semadeni AG is sustainably committed to the goal of environmental protection for current and future generations. It fully complies with all laws enacted to protect the climate and the environment, encourages its employees to act in an environmentally conscious manner, and undertakes additional climate protection measures over and above those required by law. It is vigilant about the responsible use of raw materials, biodiversity, and sustainable land management, and promotes projects dedicated to the circular economy.

Article 13 Utilization of energy and water

Semadeni AG has introduced a system to control our energy and water usage in order to reduce our consumption, limit our production of greenhouse gases and prevent environmental contamination by chemical substances.

Article 14 Utilization of hazardous substances and waste

Semadeni AG complies with the laws governing the use of hazardous substances and does not use any substances that are prohibited by national or international laws. We ensure that all waste is stored, transported and disposed of in accordance with the applicable safety standards.

5 Responsible Supply Chains

Article 15 Information about the products

Semadeni AG provides truthful information about our products to the best of our knowledge and belief and discloses all information which should be made available in accordance with national and international regulations and general industry standards. Semadeni AG expects its suppliers to disclose all relevant information in a direct and unfiltered manner.

Article 16 No procurement of “dirty” gold and diamonds

Semadeni AG adheres to the principles of responsible procurement of gold and diamonds and requires suppliers to do their utmost to ensure that gold and diamond mining practices respect human and labor rights and protect the environment. We are also committed to the Kimberly Process certification system and the World Diamond Council voluntary guarantee system (www.worlddiamondcouncil.com).

Article 17 Compliance with international export restrictions

Semadeni AG complies with national and international export restrictions and does not deliver goods to countries, organizations or persons who are on a published embargo list in Switzerland, the EU or the USA.

6 Use and Compliance

Article 18 Use of this Code of Conduct

Semadeni AG communicates the principles set out in this Code of Conduct to its employees and other stakeholders at regular intervals and is committed to ensuring that all corporate activities comply with these principles by means of policies, processes, plausibility checks, and controls. The management can provide binding information on compliance with this Code of Conduct.

Article 19 Dissemination of the Code of Conduct to suppliers

Semadeni AG expects its suppliers to comply with the provisions of this Code of Conduct, or to comply with analogous social, ethical, and environmental standards.

Semadeni AG reserves the right to obligate its suppliers to comply with this Code of Conduct and to request information concerning this compliance as well as the implementation of the associated measures. Semadeni AG further reserves the right to terminate business relationships with suppliers that violate this Code of Conduct.

When selecting suppliers, Semadeni AG takes into account compliance with environmental protection, human and labor rights, occupational safety, and anti-corruption and bribery.

Semadeni AG expects its suppliers to pay living wages and takes this information into account in its selection process.

7 Reporting violations and grievances

Semadeni AG has implemented an internal whistleblower system that provides its own employees with protection in the event of whistleblowing. The system allows for anonymous reporting, ensures independent, confidential and effective handling, and includes explanations on the protection of whistleblowers.

If you know of any violations of this Code of Conduct, you can report them anonymously to our independent complaints office. The contact details of the complaints office are available at datenschutz@semadeni.com.

For employees of Semadeni AG, the contact details of the anonymous complaints office can be found in the personnel regulations under point 2.5.

Confirmation

I hereby confirm that I have received and understood the Semadeni AG Code of Conduct.

Company name

Name & role

Place, date, signature