

SEMA Code of Conduct - Business ethics

A) Preface

The SEMA Companies are committed to honesty and integrity with respect to their entire business conduct towards employees, customers, suppliers, competitors and other stakeholders. SEMA recognizes that legal and cultural requirements vary in a global market. SEMA expects all of its employees, partners and suppliers to act with the same fair-ness, honesty and responsibility in all aspects of their business. This Code of Conduct highlights important standards that are consistent with SEMA company values and which must strictly adhere.

For easier writing and reading, the text was not gendered, but uses the male spelling. However, the content applies equally to all forms such as man / woman / diverse.

B) Regulations

1. Application

This Code of Conduct applies to any and all employees, partners, suppliers, consultants, vendors, brokers, merchants, dealers, contractors and agents of SEMA worldwide. Vice versa SEMA also demands compliance with this Code by its customers or other persons, groups or institutions associated with SEMA.

Every employee is obliged to comply with this Code of Values and to align his professional activities with the principles formulated therein.

2. Compliance with Laws, Rules and Legal Regulations

SEMA and its employees will comply with any and all applicable laws, rules and legal regulations in the countries in which it operates.

3. Respect for Human Rights, Equality, Diversity

SEMA will treat all individuals with respect and fairness and will observe basic human rights set forth, for example, in the Universal Declaration of Human Rights of the United Nations and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the UN International Labour Organization (ILO)..

These include, but are not limited to:

- * the prohibition of forced or child labour
- * Rules on fair pay, social benefits, working hours
- * Freedom of association and other fair working conditions in accordance with the law.

SEMA maintains a working environment in which

- * there is no retaliation that is free from discrimination, harassment and other dishonest behaviour due to:
 - * Gender
 - * Race
 - * Ethnic or national origin
 - * Age
 - * Skin color
 - * Nationality

- * Religion, religious beliefs
- * Veteran status
- * All other legally protected features
- * Physical or mental disability
- * Sexual orientation

Recruitment, recruitment:

Especially in recruiting, the above-mentioned points are considered, in which the applicants are judged without discrimination and bias. The focus is on integrity, transparency, trust and performance.

Women:

In particular, women's rights are respected and protected. Women are paid equally for the same jobs and women are promoted in all areas of the company.

Inclusion:

SEMA offers people with disabilities training and jobs and integrates them fully into the company.

These positive aspects are also reflected in SEMA's very heterogeneous workforce of numerous nationalities, Races, ethnicities, religious beliefs, disabilities and women in all areas of business. SEMA was awarded for its social commitment to supporting disadvantaged persons by the state of Austria (Charta - We give future).

4. Fair competition, Antitrust and Competition Law Compliance

SEMA ensures that its business practices are subject to fair competition rules. The business practices comply with all applicable anti-trust laws, trade practice laws and any other laws, rules and regulations dealing for example with monopolies, unfair competition, restraints of trade and competition, and relationships with competitors and customers. SEMA and its employees will not enter into agreements with competitors and other acts, which may unfairly impact competition, including, but not limited to, price fixing or market allocations.

5. Anti-Corruption and anti-money laundering

SEMA and its employees will comply with applicable laws and regulations concerning anti-corruption, including those concerning inland and foreign corrupt practices. SEMA will not engage in nor tolerate any form of corruption, bribery, theft, embezzlement, money laundering or extortion or the use of illegal payments. This includes without limitation, any payment or other benefit conferred on any individual, company or government official for the purpose of influencing the decision-making process whether or not in violation of applicable laws. SEMA and its employees will never offer, grant, demand or accept bribes, illegal payments, payoffs, kickbacks, alleged money laundering payments, incentives, gifts, entertainment, favours or other benefit of a value in exchange of business opportunities with or in any way related to the business operations.

6. Product Safety, Health, and Environment

SEMA will be committed to manufacture and deliver safe products to its customers. SEMA is also appealed to provide a safe working environment that supports accident prevention and minimizes exposure to health

risks to its employees. For this purpose, a monthly audit and support is carried out by an external certified safety company and an external independent company physician. SEMA and its employees will comply with applicable laws and regulations on environmental protection and will preserve resources and protect the environment as much as possible. SEMA is also environmentally certified according to ISO 14001.

7. Export and Import Regulations

SEMA will comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods and technology.

8. Data Protection, Data integrity, Confidential Information and Intellectual Property

SEMA and its employees will comply with all applicable laws concerning data protection. SEMA and its employees ensure that any confidential business information or trade secrets gained by virtue of the business activities of the customer, suppliers or partners is held in strict confidence and not improperly used or disclosed to third parties.

In order to ensure a high level of data security, data of any kind is protected against threats, manipulation, unauthorized access or access. For this purpose, the systems are secured several times at the highest security level and protected against damage or unauthorized access by various security systems (virtual and physical firewalls). These security measures are constantly updated, regularly updated or reviewed with external security experts.

9. Behaviour in Public and Among Each Other

SEMA and its employees behave in all areas (in public, in discussions, on social media, the Internet, etc.) in good social manners, both in word, image, writing, language, gestures and physical touch. These should not and may not be pejorative, harassing, hostile, discriminatory or overarching.

In-house information and events as well as external matters about customers, partners and suppliers are to be treated with utmost discretion and not in public.

This applies to SEMA's own employees as well as to other companies, customers, partners, suppliers or their employees. Conversely, this requires SEMA in turn from its customers, partners, suppliers, etc.

10. Bullying Ban

SEMA does not tolerate any kind of bullying.

Bullying is a behavior that aims to hurt, intimidate, discourage, marginalize, or marginalize a person. Bullying must not emanate or oppose either employees or superiors. Bullying against other companies, customers, partners, suppliers or their employees as well as third parties against SEMA or its employees is also inadmissible.

11. Use of private and public security services:

As a matter of principle, SEMA does not use any private and public security services.

Should they be necessary, SEMA will not act unlawfully on the part of security personnel towards employees or third parties. If necessary, security service providers are contractually obliged to respect human rights.

12. Plagiarism, intellectual property, product piracy

SEMA does not produce, use, pass on or sell any plagiarism or pirated copies (intellectual achievements, counterfeit products or materials, etc.) as its own product. There is no product piracy, product counterfeiting or brand piracy (copied ideas or inventions, etc.).

SEMA also ensures that no plagiarism, product piracy, product counterfeiting or brand piracy is adopted or used by third parties (customers, suppliers, partners, etc.), or also points this out to third parties.

Since these offences are also criminally relevant, incidents of this kind must be avoided by all employees and managers or reported if there are signs of violations. Confidential reporting is regulated under "Violation of the SEMA Code of Values or Corporate Ethics, Reporting System".

13. Conflicts of interest

If there is a conflict of interest by a person or the company that could be exploited in any way for personal or corporate good, this must be avoided or reported to the executive or, if applicable, to the management. It is essential that the conflict of interest begins when the risk of influence already exists, and not only when such influence has actually taken place. Conflicts of interest do not have to be material or financial, they can also be "non-material".

A confidential report is regulated under "Violation of the SEMA Code of Values or Corporate Ethics, Reporting System".

14. Whistleblowing system and retaliation

A whistleblower is an employee, supplier or customer who observes a grievance and wants to report it anonymously internally, without fear of negative consequences (e.g. job loss). SEMA guarantees that no direct or indirect adverse actions or decisions are threatened, recommended or initiated that report suspected error behavior or, if necessary, cooperate in investigations.

Confidential reporting is regulated under "Violation of the SEMA Code of Values or Corporate Ethics, Reporting System".

15. Financial responsibility, disclosure of information

Every employee, manager, management has corresponding financial responsibilities in his area of responsibility.

This means that each employee carefully handles indirect financial resources (such as work equipment, etc.), as well as the use of financial resources (budget funds for work tasks, products, services, etc.).

Furthermore, all business transactions and business documents are recorded in the respective systems (accounting, financial accounting, payroll accounting, ERP system, ...) in accordance with the legal and audited requirements and beyond (financial accounts, time recording accounts. Quality reports, expense reports, official documents, ...).

The Company discloses all financial and non-financial information in accordance with applicable regulations and industry practices, and also regularly discloses it to public authorities and affiliated partners, provided

that it does not conflict with data protection regulations or concern trade secrets. These documents and records are audited annually by external auditors, banks, quality or environmental auditors or even the state authorities.

16. Implementation, training, general responsibility

The SEMA Code of Values or Corporate Ethics is communicated to all employees and is part of the employment contract. In addition, employees are trained on the associated positions and demands of the company.

Managers are responsible for implementing the Code in their area. Every manager is obliged to inform his employees about the content and significance of this Code and to advise and support them in the application of the principles in their daily activities. At the same time, managers must observe the Code when performing their management tasks, e.g. in dealing with employees or as a basis for their business decisions.

17. Violations of the SEMA Code of Conduct or Business Ethics, Reporting system

The provisions of this Code and Business Ethics are fundamental to SEMA and its employees.

All indications of possible violations must be clarified prudently and quickly by the manager. If there are indications of possible violations, the employee can contact the management or contact the safety specialist or occupational medicine. All questions and comments will be treated confidentially.

This procedure also includes possible violations by external parties (customers, suppliers, partners, ...) which are monitored by SEMA employees.

Complaints from external parties (customers, suppliers, partners, ...) in the event of violations by SEMA employees against third parties or against the SEMA Code of Values - Business ethics can be made to the managers or to the SEMA management.

The reports can be made by document, e-mail, telephone or personal conversations with the responsible persons. The information can also be made anonymously and handed in in the mailbox. The contact details are accessible or visible to everyone in notices.

These responsible persons follow up on the information and, if necessary, take corrective action.

Therefore, if employees, partners or suppliers do not comply with the Code of Conduct, SEMA reserves the right to terminate the employees or business relationship subject to applicable laws.

Date and Signature:

17.02.2023

Geschäftsführung/CEO