

CODE OF CONDUCT



“Performance pushes us forward – integrity keeps us on track.”

For over 200 years, Semperit has stood for excellence, innovation and resilience. Our success is built not only on technical expertise and high-quality elastomer solutions, but also on the integrity with which we operate.

We strive to succeed, supported by our ethics in doing business and the rule of law. Respect and trust form the foundation of our relationships with colleagues, customers, business partners, and the wider community. **We Trust, We Create, We Own and We Deliver. Living these values means acting responsibly every day.**

Our Code of Conduct sets clear standards, helps us make the right decisions and defines the ethical principles we expect from ourselves and our business partners. We will effectively address any violation of the Code of Conduct and take appropriate actions to ensure compliance. The Code of Conduct also serves as the basis for our policies and procedures which offer more detailed guidance through linked resources.

Our words, behaviors and actions matter. If something doesn't feel right, we pause, reflect, and speak up. Raising concerns is the right thing to do—your voice will be heard, confidentiality will be respected, and retaliation will not be tolerated.

This Code of Conduct empowers us to make the right choices, even in complex situations. Thank you for your commitment to doing what's right — for Semperit and for all those who rely on us.

**The Executive Board
Semperit AG Holding**





Gerfried Eder, Chief Industrial Officer (CIO) | Manfred Stanek, CEO | Helmut Sorger, CFO



01	WE DO WHAT IS RIGHT	6
	Our Code of Conduct	9
	Our Values	14
	Our responsibilities	16
	Leading with integrity	18
	Make sound business decisions	20
	We always speak up	22
02	WE BUILD AND EARN TRUST	28
	Building trust through compliance	30
	Say no to bribery and corruption	32
	Conflict of interest	36
	Trade controls and sanctions	38
	Fair Competition	40
	Anti-money laundering	42



03	WE EMPOWER AND RESPECT	44
	Human rights	46
	Social and labor standards	48
	Environment protection, health and safety	52
	Protect each other and community	54

04	WE SAFEGUARD WHAT MATTERS	56
	Sensitive information	58
	Artificial intelligence	58
	Data protection and privacy	59
	Cyber security	59
	Communications	60
	Internal control rules	62

01 WE DO WHAT IS RIGHT



At Semperit, doing the right thing is not just a principle—it's part of our identity.

Over the years, we've evolved into a focused industrial group with two high-performing business units, Semperit Industrial Applications (SIA) and Semperit Engineered Applications (SEA) driving innovation and global competitiveness.

Our success is built on more than performance—it's built on trust, integrity, and ethical conduct.

Our choices today are driven by care for the future guided by climate responsibility, equity, and long-term sustainability.

We are known for reliability, resilience, and practical ingenuity. We run on rubber—not just as a material, but as a mindset. We stretch, we rebound, we solve. We keep industries running and the world in motion.



We do the right thing.



OUR CODE OF CONDUCT

This Code of Conduct is our compass — it guides our behavior at work and helps us make better decisions every day. We are strictly committed to high standards of legal compliance and business ethics. Our values remind us what we stand for and how we do business.

The Code of Conduct sets clear principles, standards, and ethical expectations for the Group and connects us to our framework of policies, guidelines and instructions, helping us recognize what's right, what's wrong, and how to act and respond in different situations. It empowers us to act with confidence, integrity, and common sense—even when the right path isn't obvious.

Each of us is responsible for following rules and regulations that apply to and within Semperit and in all external business environments.

This Code of Conduct **provides clear direction and a strong foundation for your ethical decision-making.** We act with integrity—and expect all our business partners to uphold similarly high compliance standards and principles and to conduct their business ethically.

“If you're ever unsure, pause, reflect, and ask for guidance.”

WHY DO WE HAVE A CODE OF CONDUCT?

Our Code of Conduct is more than a set of rules—it's the foundation of a culture we can all be proud of. It's a reminder that every action, no matter how small, contributes to Semperit's reputation and long-term success.

Respect is at the heart of everything we do—towards each other, our business partners, communities, and the environment. We create a workplace where everyone feels valued, included, and safe to share ideas or concerns. This is how we build trust, foster collaboration, and hold ourselves accountable.

In today's fast-moving world, you might often be faced with new and complex ethical dilemmas. Making the right decision isn't always easy. While the Code of Conduct can't answer every question, **it's always here to point you in the right direction and connect you with the resources and people who can provide support.** And when something doesn't feel right, listen to your moral self. No code can substitute your judgement. Take a breath, ask questions and speak up, knowing you are supported every step of the way.

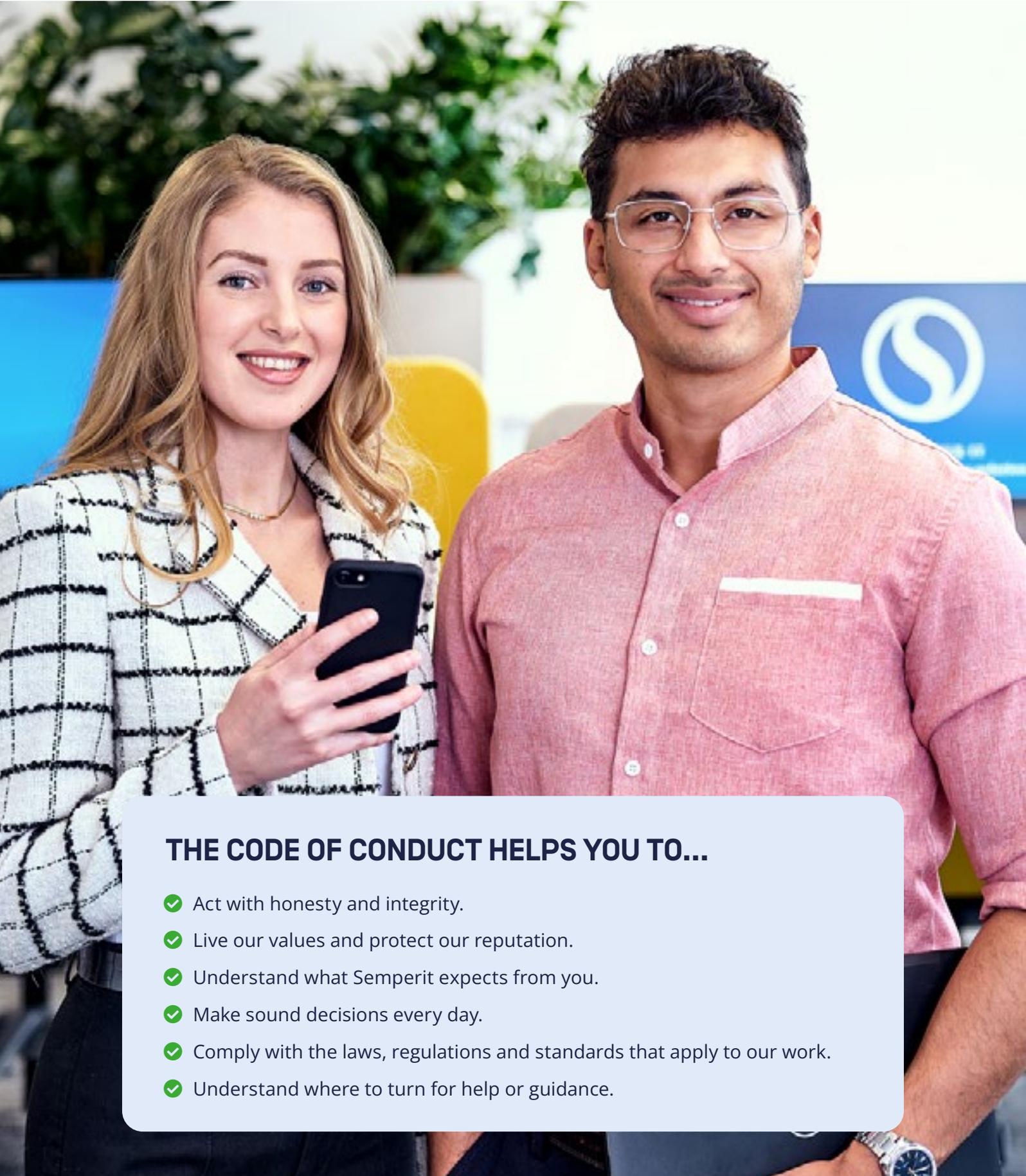
Remember, if local customs or business practices don't align with our standards, follow the Code of Conduct. If a local law conflicts with our Code of Conduct, follow the law. When you are still unsure, ask your team lead, our colleagues in People&Culture or Compliance for support.

Ultimately, the Code of Conduct is our shared commitment to bring our values to life, compete fairly, and ensure Semperit remains a responsible, ethical, and sustainable company we're all proud to be part of—today and for the future.

Let's make it count, together!







THE CODE OF CONDUCT HELPS YOU TO...

- ✔ Act with honesty and integrity.
- ✔ Live our values and protect our reputation.
- ✔ Understand what Semperit expects from you.
- ✔ Make sound decisions every day.
- ✔ Comply with the laws, regulations and standards that apply to our work.
- ✔ Understand where to turn for help or guidance.

TO WHOM DOES THIS CODE OF CONDUCT APPLY TO?

To everyone at Semperit. From board members and directors to our workforce: employees, contingent workers, contracted workers, and ones working on our behalf — this Code of Conduct is for all of us.

It covers every Semperit subsidiary worldwide, as well as any entity where we hold a majority interest or manage operations.

Wherever we work together, we all share the same responsibility, expectations and commitments to live by this Code of Conduct. Team leads and managers at all levels should lead with integrity and provide our workforce with appropriate guidance and support.



WHAT ABOUT OUR BUSINESS PARTNERS?

We expect our suppliers, vendors, and other third-party **business partners to uphold to the same high standards of integrity and ethical conduct** and follow the principles outlined in our Code of Conduct.

The specific requirements for our partners are detailed in our [Group Supplier Policy](#) and must be considered in our contractual relationships.

WHAT HAPPENS IF SOMEONE VIOLATES THE CODE OF CONDUCT?

Trust is hard to earn and easy to lose. When someone violates our Code of Conduct, our policies, or the law, it affects themselves, and all of us. It weakens the trust our stakeholders place in us and can seriously damage Semperit's reputation.

Breaches against the Code of Conduct will be addressed. We will strive to ensure no further violation will happen and rectify any harm done.

For our employees this means that **violations can result in disciplinary action, up to and including termination of employment.** For our stakeholders this means that we **might terminate our business relationship and seek damages.** Depending on the situation, violations can lead to civil or criminal consequences for the person involved and for Semperit as a company.

OUR VALUES

In a fast-moving and competitive world, staying true to our values is essential.

Apply them to our day-to-day work and reflect what the Semperit brand stands for:
ethical business conduct at all times.



Semperit Value Principles translating values into expected behavior



 **LEARN MORE**

[Semperit Values](#)

OUR RESPONSIBILITIES

What is my personal responsibility?

Being your best, every decision, every day

Navigate ethical challenges, ensure you act with integrity and stay true to our values even when things get complicated or uncertain.

Know and live up to our Code of Conduct

Read it and follow it, along the applicable laws and regulations, internal policies and guidelines that apply to your work. Learn what is essential for your line of work, and how to use different tools that you need to complete your tasks. Complete all trainings assigned to you, as this is the best way to gain knowledge and learn more.

Earn trust through ethical decision making

Be committed to responsible business conduct. Always act with honesty, fairness and integrity in everything you do. No exceptions. Listen, pause, reflect and speak up or ask for advice. Ask your team lead or compliance on appropriate business conduct.

Respect each other, our company and the environment

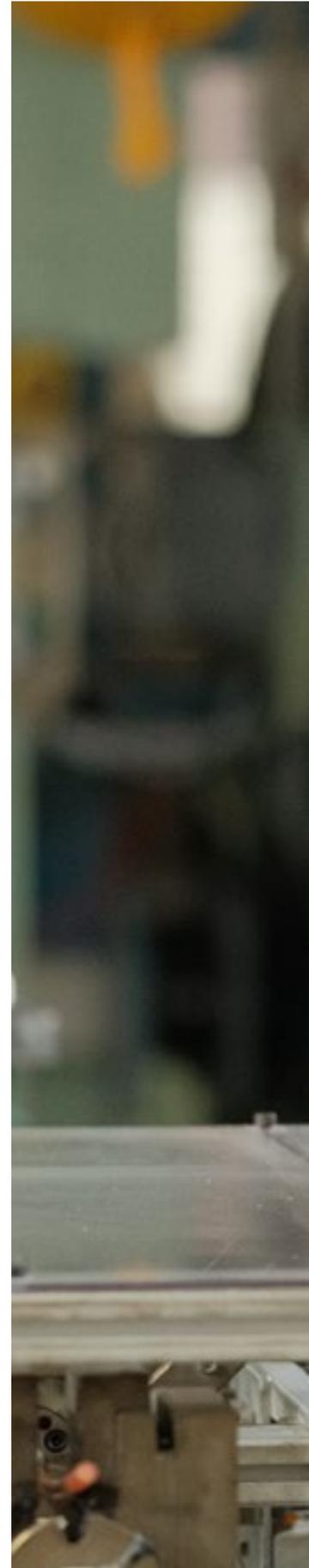
Treat everyone with dignity, free from harassment or discrimination. Consider people, planet and long-term impact. Protect human rights, our assets, environment, confidentiality, privacy and information.

Think before you act

Use good judgement, ask questions. Be accountable for your actions. Do not let the pressure of success make you do things you know are wrong. Remember, no one can ask you to break the law or ignore our standards. Never misuse your position or company assets or use them for private gain.

Always speak up

If you are ever unsure or something doesn't feel right, always speak up and ask for help. Feel free to ask questions or raise concerns without fear of retaliation. Do not ignore a violation. If you suspect or witness misconduct or unethical behavior always [Speak Up!](#)





IF MY TEAM LEAD ASKS ME TO DO SOMETHING THAT MIGHT VIOLATE OUR CODE OF CONDUCT OR A LAW...

- ✓ Raise your concerns openly and honestly with your team lead.
- ✓ Seek help if needed. If the response doesn't feel right or you're uncomfortable, use other Speak up channel ([SemperLine](#)).
- ✗ Never knowingly violate our Code of Conduct, policies or the law, even if a team lead directs you to do so or because you didn't ask for support.



LEADING WITH INTEGRITY

What, in addition, is expected of me as a team lead?

While every employee at Semperit is expected to act with integrity, team leads and managers carry an even greater responsibility- leading with example. As a team lead you should follow Semperit [Leadership Operating System](#) and implement it in practice.

Lead by example

You shape Semperit's culture, you set the tone. Act as a role model for compliance and ethical decision-making, not just in what you say, but in how you act every day.

Set the standard

Make it clear to your team that success must come through ethical behavior and full compliance with our Code of Conduct and laws. Make time and space for frequent open conversations about doing business the right way.

Create a safe space

Build an environment where everyone feels safe, free and confident to come to you with questions and concerns without fear of retaliation.

Listen and support

Listen, reflect and react. Try to answer any questions or concerns. If you need help, reach out to the relevant departments or Compliance.

Act without delay

Address non-compliant behavior immediately. Document and escalate concerns raised to you to [Group Compliance Department](#) or [Local Compliance Coordinator](#).

Prevent retaliation

Do not retaliate against the ones who raise concerns. Protect them!

Reward

Acknowledge and include integrity in performance goals.

LEARN MORE

[Semperit Leadership Operating System](#)

MAKE SOUND BUSINESS DECISIONS

Every decision we make can impact us, our stakeholders and our business. Most of the time, applying our Code of Conduct is simple. The situation is clear, and so is the right decision. But sometimes, we find ourselves in a situation where the next step is not obvious.

“In every decision you make, we count on you to use your good judgment and follow the laws and internal rules.”

There will be times when you’ll be under pressure or unsure of what to do. Always remember when you have a tough choice to make, you’re not alone. We are here to listen!



PREPARE

Make sure you have all that it needs to take good decisions.

- Do you have all the facts that allow you to make a good decision? If you are not sure, whether the decision is the best one, challenge your information base.
- Do you feel comfortable making the decision?
- Is your inner voice in line with your decision?
- Will you regret it?



STOP & REFLECT

Do not rush your decisions.

- Do you have all the information you need to make a decision?
- Is your decision legal?
- In line with values and the Code of Conduct?
- Are you authorized to make this decision?
- What are consequences of your actions?
- What impact would the decision have?
- Are you forced to make it?



ASK & SPEAK UP!

Still in doubt what to do? Ask!

You listened your inner voice, you stopped and you reflected.

Still in dark? Ask and speak up, share our concerns and seek advice from your team lead, [Group Compliance Department](#) or [Local Compliance Coordinators](#) who will support you in making the right decision.

BEFORE YOU ACT, ASK YOURSELF...



Have I checked all the facts?



Is it compliant with applicable laws and regulations?



Is it in line with Semperit's values, Code of Conduct and policies?



Does it reflect our commitment to our stakeholders?



Am I authorized to make a decision?



Could the decision harm me or the company?



What would others think?



WE ALWAYS SPEAK UP

At Semperit, we want you to feel entirely free, confident and safe to ask questions, or raise concerns:

- ✓ if you are **unsure what to do**
- ✓ if **something doesn't feel quite right, or**
- ✓ if you **notice something unsafe, illegal, unethical, or potentially harmful**—to yourself, colleagues, business partners or our company.



Your voice prevents harm

We encourage you to come forward if you're unsure what to do, worried you may have made a mistake or been involved in something that doesn't seem right.

The sooner we become aware of potential issue, the faster we can address it and minimize their impact, find solutions and prevent further similar incidents. That's how we protect each other, our company, and our reputation.

Say something as soon as you see something

We expect you to speak up right away, if you do not know what to do or if you become aware of any behavior that could breach our Code of Conduct, internal policies or law, even if you're not sure a violation has occurred.

Raising concerns is a duty, not a choice.

Please reach out without hesitation if you feel unsafe or pressured to act against our rules or the law.

Together we protect: speak up, be heard

Speaking up is more than reporting serious violations, it's about building a culture of openness and trust. Whether you're raising a compliance issue, sharing a work related concern, or simply asking a question, your voice matters.

At Semperit, we are committed to treating every input — no matter how big or small — with respect, fairness, and thoroughness.

“We understand that speaking up isn't always easy. It sometimes takes courage to ask questions or raise concerns, but doing so builds trust across our teams, our company, and with our partners.”



HOW CAN I SPEAK UP TO RAISE CONCERNS?

If you want to report misconduct, raise a concern, or ask a question and prefer not to use regular communication channels (your team lead or People&Culture) you can speak up directly through:



SemperLine–Hotline: Our secure, confidential web portal, available anytime for our workforce and external parties in different languages.



SemperBox – send us a letter: Safely drop a letter anonymously in the designated postbox at your production site.



Or you can email, visit or call us:
compliance@semperitgroup.com, +43 1 79777240

SOMETHING NOT RIGHT? SAY SOMETHING. WE ARE HERE TO LISTEN!

Everyone is responsible for promptly recognizing and speaking up about irregularities or violations. Asking questions or raising concerns helps prevent misconduct. You are free to choose any channel whether the issue affects you, others, or the company:

Talk to your team lead

Your team leads are here to guide you. They understand the business and the rules that apply to your work. Whether you're facing a dilemma or need clarity, they're your first line of support.

Reach out to People&Culture

People&Culture is your go-to for workplace questions or concerns, from values and behavior to policies on harassment, bullying, discrimination, and more. They help ensure a respectful and fair environment for everyone.

Ask or speak up to Compliance team

[Group Compliance Department](#) or [Local Compliance Coordinators](#)

offer guidance on compliance and ethical business practices. They also receive and confidentially investigate your concerns reported through any channel, including team leads, managers, People & Culture, or other departments.

i LEARN MORE

[Speak Up!](#)

[SemperLine](#)

[Speak up Policy](#)

[Local Compliance Coordinators](#)

[Group Compliance Department](#)

REPORTED CONCERNS ARE TAKEN SERIOUSLY

Our standardized process ensures each concern submitted by our workforce, candidates in recruitment, business partners or externals is handled consistently.

What can I report and how?

You can report suspected violations of laws, our Code of Conduct, or internal policies (see [Speak Up! FAQ](#)). Describe what happened, who was involved, when, where, and how and attach any relevant documents. Do not risk your safety, break any rules or laws to gather information.

What happens after I report?

Compliance team examines each report to determine, if it can be processed further- to be able to get all relevant information. You're encouraged to stay in contact, either by providing your name or via anonymous [SemperLine](#) postbox.

Group Compliance presents the topic to the Compliance Board, advises on next steps and shares investigation outcomes, always maintaining confidentiality. It is expected that everyone involved cooperates fully and honestly. In case of a confirmed violation, Semperit will take action in line with applicable law.

Can I report things I am not sure of?

You are not under obligation to verify the facts you have witnessed or your observations before coming forward.

Please keep in mind however, that your report may influence important decisions and impact those involved, so it must be accurate. If the facts you report are hearsay only or rather vague suspicions you have to indicate this accordingly.

Knowingly making false accusations, lying during investigations, or submitting misleading, false, or illegal information is strictly prohibited and can have disciplinary or even legal consequences.

Can I report anonymously?

Where permitted by law Semperit allows you to make reports anonymously.

While anonymous reports are accepted, they cannot be fully investigated if essential information is missing.

Is confidentiality maintained?

Absolutely. All reports are handled with care, following principles of confidentiality, professionalism, independence, and fairness.

LEARN MORE

- [Speak Up!](#)
- [SemperLine](#)
- [Speak up Policy](#)
- [Investigation manual](#)



RETALIATION IS STRICTLY PROHIBITED

Everyone should feel safe to speak up without fear. We do not tolerate any form of negative action against individuals who speak up and share concerns in good faith or participate in investigations, even if the concern turns out to be unfounded.

Retaliation includes among others termination, demotion, unjustified negative evaluations, exclusion from meetings, verbal or any other abuse, threats, or any form of punishment.

If you experience retaliation please contact compliance@semperitgroup.com or report it through the [SemperLine](#).

We thoroughly investigate all credible allegations of retaliation or mistreatment. If any act of retaliation in our company is confirmed, decisive and severe action will be taken against those responsible.

02 WE BUILD AND EARN TRUST



In light of growing economic, regulatory, social, and ethical demands—as well as rising stakeholder expectations—integrity and compliance have become essential to how we operate globally.

As a part of our Sustainability Strategy these principles are more than formalities—they form the foundation of how we build and maintain trust with our workforce, suppliers, customers, business partners, and stakeholders, while upholding good governance.



„We uphold integrity as a daily commitment to earn trust, lead responsibly, and shape a business that people believe in.“

BUILDING TRUST THROUGH COMPLIANCE

A strong global integrity and compliance management system helps us build and earn trust within the company and with our business partners and stakeholders.

Navigating major risks

Effective integrated framework approach helps us enables us to identify and prevent unlawful or unethical behavior, manage risks, investigate alleged misconduct, and understand impacts of identified issues. Based on three core pillars, it turns words into action and action into meaningful change.



PREVENT

We focus on spotting risks early, within our teams. Ongoing learning and regular compliance trainings help everyone recognize and avoid potential pitfalls. Prevention means putting our Code of Conduct, policies, guidelines, processes and controls into practice every day.



IDENTIFY

We identify challenges and risks through open conversations, speaking up about concerns, checking our business partners, data analytics, monitoring, review and audits. If you spot a potential issue or violation, [Speak up!](#)



MITIGATE

When issues arise, we act fast. We review and investigate concerns, implement recommendations and solutions and follow-up corrective actions to reduce risks and protect our company, our workforce, and our business partners.

Compliance promotes transparency, accountability, supports better decisions, and fosters respectful, honest communication across all levels of the organization and with external stakeholders.

 **LEARN MORE**

[Integrity and Compliance Management System](#)



THE SIX GROUP-WIDE COMPLIANCE PRINCIPLES

Compliance with domestic and international laws

Fostering a speak-up culture without any fear of retaliation

Promoting fair competition



Respecting ethical, ecological and social interests

Dedicated to a business free of corruption or any other criminal activity

Protecting human rights

SAY NO TO BRIBERY AND CORRUPTION

We are committed to winning customers and business based on the quality of our products and services and we abide by the rule of law—we never gain advantages through bribery or any other unethical or illegal activity. We always comply with anti-bribery and anti-corruption laws wherever we operate, remain alert to any suspicious behavior and report concerns immediately via [SemperLine](#).

“We do not get involved in bribery to win business, keep business, or gain an unfair advantage.”

Always say no to bribes

We have zero tolerance towards bribery. We never offer, provide, or authorize bribes of any kind, including facilitation payments, either directly or indirectly, including through third parties, to a public official or a private individual. We never request or accept bribes of any kind directly or indirectly. We expect the same commitment from all our business partners.

We do not cut corners

We work hard to succeed. Although it might appear tempting to give or accept something of value to close a deal, keep a customer or speed up a process, we will not do so. It does never pay off in the long run. It might seem tempting, but don't do it. We never attempt to improperly influence business decisions or government actions.

Corrupted practices damage our reputation, reduce the quality of our products and services, increase costs, and can lead to serious consequences, such as fines, lawsuits, criminal charges, loss of business, or even exclusion from public tenders.

Risk management

We manage bribery and corruption risks through clear procedures and controls covering public official interactions, managing benefits, sponsorships and donations, business partners checks, conflict of interest management, political contributions limitations, and proper record keeping.

LEARN MORE

[Group Anti-Bribery and Anti-Corruption Programme](#)

[Group Anti-Bribery and Anti-Corruption Policy](#)

ASK YOURSELF...

Are you sure, you are not trying to influence someone's decision or gain an unfair advantage?

- ✘ Even small gestures like gifts, favors, or offers can cross the line.
- ✘ Never offer, promise, give, authorize, solicit, request, accept or receive anything of value with the intent to improperly influence someone's judgement or decision, directly or indirectly, including through third parties.

Could this be a bribe?

- ! If someone offers money, gifts, travel, or special favors in exchange for a business decision, it's likely a bribe. Would you feel uncomfortable if others knew about this? If yes, don't do it.

ASK YOURSELF...

Did you check your business partner?

Always screen suppliers, customers, agents, and other third parties to ensure they're not involved in questionable practices. Make sure that those who act on our behalf (sales agents, consultants and others) do not give, offer, or accept bribes or attempt to improperly influence decisions.

Why, how often, how much? Perceived as inappropriate?

Make sure benefits are moderate, appropriate, reasonable, and proportionate to the occasion when you receive and give. Do not offer repeated or accumulating benefits. Check local laws if public officials can receive benefits at all. Consider how the benefit given or received may be perceived. Inform your team lead and get approval in our [Granting and Receiving Benefits Portal](#) when needed.

Is a deal or decision pending?

Avoid giving or accepting benefits during negotiations—it may be seen as undue influence or bribery.

Do you need approval?

Before giving or receiving anything of value check our guidelines. Approval is required for public officials or if the value exceeds the allowed limit.

Are you asked to give a facilitation payment?

In some countries, public officials may request small payments to expedite or secure a routine action (issuing licenses, permits, visas, providing customs clearances). Do not pay unless the refusal would put your safety at risk. Inform Compliance immediately.

Need help?

Follow our guidelines and approval process.

If unsure, ask your team lead or contact Compliance at compliance@semperitgroup.com.

TO PREVENT CORRUPTION AND BRIBERY, BE AWARE OF...

Gifts, hospitality and entertainment

Modest gifts, meals, or invitations can help build trust and strengthen business relationships. However, what's considered acceptable can vary widely across countries and cultures. Always use good judgment, check whether benefits are permitted by local law, could be perceived as a bribe, or might be inappropriate and handle all benefits in line with our internal guidelines. Simply: whether given or received, they should be modest and occasional, with no intent to gain advantage, influence decisions or create conflicts of interest.

Cash and facilitation payments

We do not offer or accept cash or cash equivalents. This includes facilitation payments—small payments made to speed up routine government actions. Even if common in some countries, such payments are illegal and considered bribes. You are strictly prohibited from making them.

Dealing with public officials

When interacting with public officials or representatives of state-owned entities, exercise extra caution. Even small gestures can be seen as an attempt to improperly influence a decision. Always comply with applicable laws and follow our internal guidelines and whenever possible, avoid meeting public officials alone.

Political contributions and lobbying

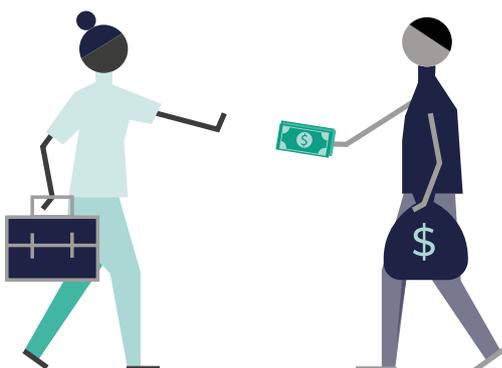
We do not make any direct or indirect contributions to political parties, organizations, or individual politicians. All lobbying activities must be lawful, transparent, and pre-approved.

Donations and sponsorships

We support community-benefiting donations and sponsorships that reflect our values. They must be transparent, properly approved and documented and never intended to influence business decisions.

Business partners

Before entering or renewing any partnership, we conduct [Business Partner Check](#) to assess potential risks. Partners are expected to act ethically, comply with applicable laws, and cooperate with any compliance reviews or audits.



LEARN MORE

[Group Third-party Intermediary Guideline](#)

[Group Gifts, Hospitality and Entertainment Guideline](#)

[Group Donations and Sponsorship Guideline](#)

[Dealing with business partners](#)

CONFLICTS OF INTEREST

At work, our decisions must always be objective and reflect the best interests of Semperit. Still, personal, financial, or other interests and relationships can sometimes influence or appear to influence our professional judgment or decisions.

These situations can happen unintentionally, and don't necessarily mean that someone is improperly motivated or acted illegally. However, they can become problematic, or even a legal issue, if they affect business outcomes or raise concerns about fairness or integrity. Even the appearance of a conflict of interest can be as damaging as an actual one.

Acting in Semperit's best interest

A conflict-of-interest situation is not always easy to identify. We challenge ourselves to identify whether our personal interest, including those of people close to us, might interfere with our duty as employees of Semperit.

We avoid any financial or personal relationships that could compromise or appear to compromise your independence or judgment. We keep personal ties out of hiring, promotion, or business decisions, and don't do favors or make decisions involving your family, friends or their companies.

When selecting third parties we base our decisions on objective factors like quality, reliability, and price, not personal connections. Before accepting outside roles, starting side business, or making investments, especially those involving competitors, we check if we need approval.

We never exchange business advantages for personal benefits, use company information for personal gain, or take part in activities that compete with Semperit. We protect confidential information such as pricing, strategies, or future plans.

Navigating conflict of interest situations

If something feels uncertain, we pause, assess, and seek guidance. It's vital to avoid, identify, and properly manage any actual, potential, or perceived conflict of interest to protect our integrity and reputation.

If a situation might involve or might be seen as a conflict of interest, we disclose it to our team lead. Together with Compliance, team leads within Semperit will assess the situation and provide guidance. We are transparent on potential conflicts as soon as we become aware of them. Failing to disclose a known conflict may be treated as misconduct.

LEARN MORE

[Group Conflict of Interest Policy](#)

[List of situations and circumstances where conflicts of interest may arise](#)

[Disclosure Form and Assessment](#)



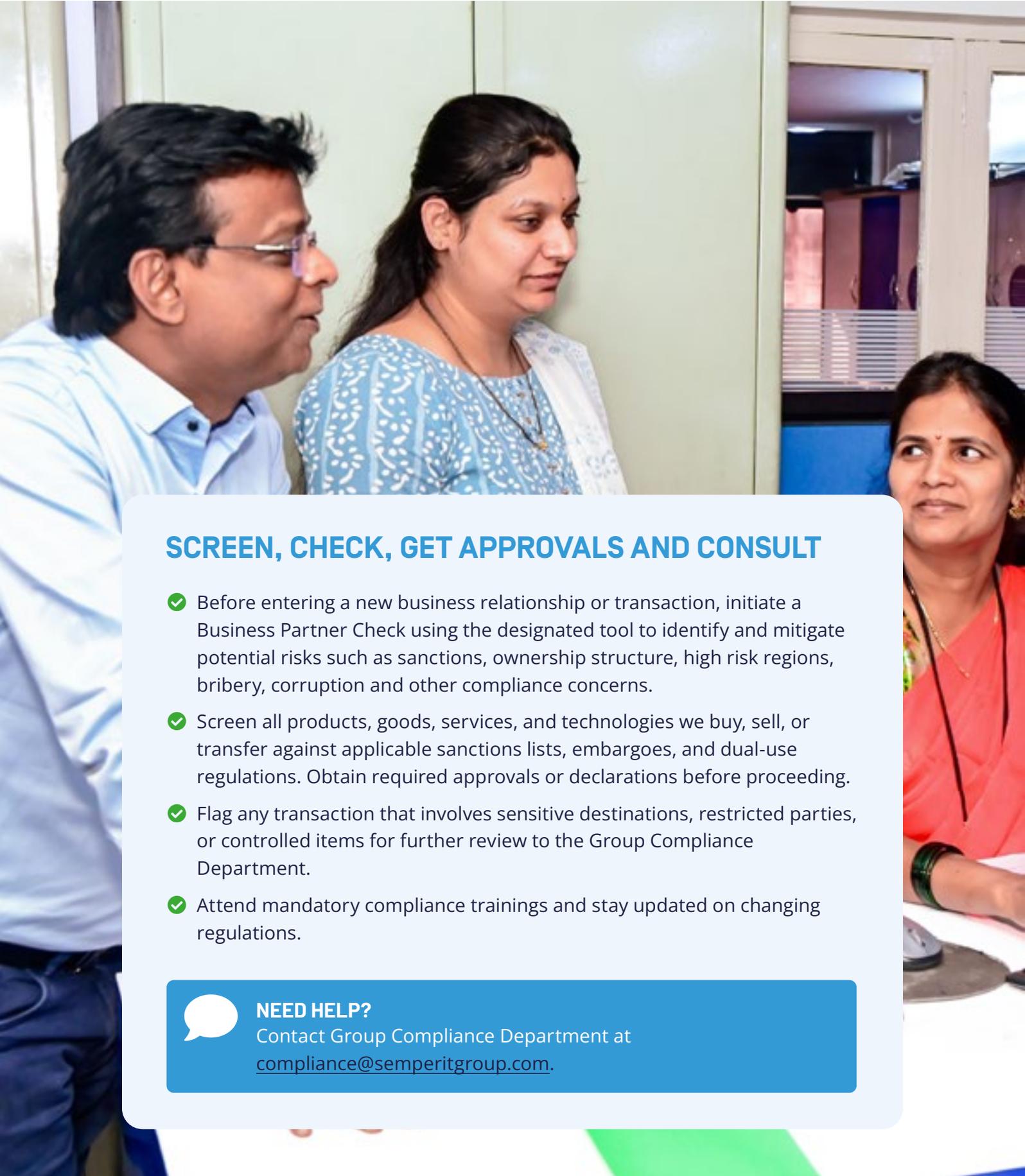
QUICK SELF-CHECK

- ✓ Do your private interests overlap with your job duties?
- ✓ Could your decision benefit you, a friend, or a relative financially or professionally?
- ✓ Could others perceive your decision as biased or unfair or think that you are personally benefiting from the situation?
- ✓ Could this harm Semperit's reputation or objectivity?
- ✓ Are you influencing decisions where you have a personal stake?
- ✓ If your answer is "yes" or "maybe", disclose the situation to your team lead.



NEED HELP?

Contact your team lead or compliance@semperitgroup.com.



SCREEN, CHECK, GET APPROVALS AND CONSULT

- ✔ Before entering a new business relationship or transaction, initiate a Business Partner Check using the designated tool to identify and mitigate potential risks such as sanctions, ownership structure, high risk regions, bribery, corruption and other compliance concerns.
- ✔ Screen all products, goods, services, and technologies we buy, sell, or transfer against applicable sanctions lists, embargoes, and dual-use regulations. Obtain required approvals or declarations before proceeding.
- ✔ Flag any transaction that involves sensitive destinations, restricted parties, or controlled items for further review to the Group Compliance Department.
- ✔ Attend mandatory compliance trainings and stay updated on changing regulations.



NEED HELP?

Contact Group Compliance Department at compliance@semperitgroup.com.

TRADE CONTROLS AND SANCTIONS

We work with partners and customers across many countries, which means our business activities are subject to various trade control, export laws, and rules governing dual-use products and technologies.

Trading responsibly

These regulations may restrict or prohibit certain transactions, transfers, products, services, or dealings with specific countries, organizations, or individuals.

Our priority is to ensure that Semperit products and technologies, are never used in ways that could cause harm or violate international regulations. To achieve this, we strictly comply with all applicable trade restrictions, embargoes, sanctions, anti-terrorism laws, as well as any other regulations designed to prevent the misuse of our goods and services. We also expect our business partners to follow these rules.

We must understand the potential impact of these prohibitions and restrictions, recognizing that some materials, products, deals, customers, or regions may be off-limits.

Business partner check

Before entering a new business relationship or transaction, we initiate a [Business Partner Check](#), a due diligence process designed to identify and mitigate potential risks. This includes verifying whether the other party or their goods and services are subject to sanctions, embargoes, or classified as dual-use items.

This proactive approach is essential, as violations of laws and regulations can lead to serious legal and reputational consequences for Semperit and the individuals involved.

“Because we do business globally, we must also think globally when it comes to trade rules and sanctions.”

 **LEARN MORE**

[Group Business Partner Check Guideline](#)

FAIR COMPETITION

Committed to free and fair competition

At Semperit, we compete to win, but always fairly, transparently, in compliance with antitrust and competition laws and regulations wherever we operate. Any breach of antitrust laws can result in severe financial penalties, legal consequences, and reputational damage, not just for Semperit, but also for the individuals involved.

Every decision we make must reflect our commitment to fair and transparent business practices at all times. Avoid any behavior or arrangement that could restrict or appear to restrict fair competition. This includes any coordinated behavior, informal meetings, or “gentlemen’s agreements” with competitors.

Agreements and interaction with competitors

We must never engage in any agreements or communicate in any form (written, electronic or verbal) to:

- directly or indirectly agree upon, fix, or influence prices, discounts, rebates, credit or any other trading conditions
- allocate or divide markets, customers, territories or products
- limit or control production, sales, or services.
- boycott or refuse to deal with particular customers or suppliers
- engage in any type of collusive behavior or concerted action or any practice that manipulates procurement or tender processes
- share or discuss sensitive or confidential business information or data on pricing, customers, costs, market shares, our innovations and similar.

Abuse of a dominant market position

We do not use our market position to force unfair terms, pressure or unduly restrict suppliers, distributors or customers, including exclusivity agreements nor do we engage in any strategies that may constitute an abuse of a dominant market position.

LEARN MORE

[Group Anti-trust and Anti-Competition Policy](#)

[Group Competitors Meeting Guideline](#)

[Group Business Partner Check Guideline](#)

[Anti-Trust Guideline](#)

DO ...

- ✔ **Compete fairly**
Offer better products, services, and prices through innovation and efficiency rather than unfair tactics.
- ✔ **Follow fair pricing strategies**
Set prices based on market competition rather than collusion or agreements with competitors.
- ✔ **Ensure agreement transparency**
Business contracts, mergers, and acquisitions should comply with competition laws and regulatory approvals.
- ✔ **Collect information**
Use only public available information such as information received in trade shows and public industry events, brochures, supplier manuals, media and analyst reports.
- ✔ **Communication with competitors**
Use our guidelines for proper communication and report any attempt and contacts with competitors.
- ✔ **Consult legal experts**
Before granting exclusive rights or limiting how goods or services can be used, resold, or priced, consult with our Legal department.
- ✔ **Report anti-competitive practices**
If you witness price-fixing, bid-rigging, or monopolistic abuses, report them to the Group Compliance Department (compliance@semperitgroup.com).



NEED HELP?

Contact Group Compliance Department
compliance@semperitgroup.com.

DO...

- ✓ **Always verify** who we're doing business with through Business Partner Check and financial checks.
- ✓ **Watch for unusual transactions**, such as unexpected large payments or sudden changes in business partners.
- ✓ **Avoid cash deals** and ensure all payments go through traceable banking channels.
- ✓ **Report anything that feels suspicious** to your team lead or the compliance team—no question is too small.



NEED HELP?

Contact Group Compliance Department
compliance@semperitgroup.com.

ANTI-MONEY LAUNDERING

We categorically oppose any form of money laundering, tax evasion, or other practices that obscure the legitimate purpose of financial transactions.

We do not engage in, facilitate, or tolerate any activities that could be used to disguise the origin of funds or to conceal the true business rationale behind transactions. This includes any arrangements that could be perceived as attempts to avoid tax obligations or to mislead stakeholders.

We are expected to ensure that all transactions are transparent, lawful, and justifiable and we expect the same from our business partners.

There are a few practices that could accidentally open the door to money laundering in Semperit:

- accepting payments from unknown, unverified or unrelated customers or countries
- doing business with companies that exist only on paper (so-called “shell companies”)
- making or accepting large cash payments, overpayments or cash equivalents often followed by requests for refunds
- orders, purchases or payments that are unusual or inconsistent with a customer’s trade or business
- unusually complex deal structures
- skipping proper checks and documenting.

To prevent these risks we only work with trusted partners, follow legal payment processes, and report anything suspicious.

03 WE EMPOWER AND RESPECT



At Semperit, we believe that empowerment and respect are the cornerstones of a responsible and sustainable business.

We are committed to upholding human rights, promoting fair social and labor standards, and zero accidents in our working environment, ensuring environmental protection, health, and safety in everything we do within our company, and throughout our value chain.

We treat each other and our communities with dignity, fostering a culture of inclusion, trust, and mutual support.

Open and respectful communication is essential to our success. It enables collaboration, drives innovation, and strengthens our shared values.



„Together, we create a workplace where everyone feels valued, heard, and empowered to contribute.”

HUMAN RIGHTS

Every member of our workforce has the right to be heard, supported, and treated justly. This is essential for building trust and maintaining a strong, values-driven culture at Semperit. We understand our responsibility to respect and promote human rights by setting clear expectations and working closely with our partners across our value chain, aiming to embed dignity, fairness, and equality into all our activities.

Our commitment to ethical business practices is grounded in internationally recognized standards, including the UN Guiding Principles on Business and Human Rights, the core labor standards of the International Labour Organization (ILO), and all relevant local laws. These form the basis for our expectations which are clearly defined in the [Group People Policy](#) for our employees and the [Group Supplier Policy](#) for our business partners. Adherence to these principles is a prerequisite for establishing and maintaining the relationships we want to have in our working environment and for ensuring that the rights and interests of affected communities within and outside of Semperit are respected.

We empower our workforce through regular training and awareness initiatives that help us continuously improve how we work together. Our approach to identifying, preventing, and addressing human rights risks and impacts is outlined in our [Human Rights and Modern Slavery Act Statement](#) and [Sustainability Report](#), reinforcing our dedication to high social standards across all areas of our business.

“We treat all stakeholders—employees, customers, suppliers, and partners—with respect, transparency, fairness and integrity.”

 **LEARN MORE**

[People Policy](#)

[Group Supplier Policy](#)

[Human Rights and Modern Slavery Act Statement](#)

[Charter of Diversity](#)

[Semperit Annual Report—Sustainability Statement](#)





SOCIAL AND LABOR STANDARDS

Our approach to social and labor standards is shaped by international labor principles, applicable laws, and a strong sense of what's right. These standards help us create a workplace where people feel safe, valued, and motivated to grow. They also make Semperit a place where talented people want to join and choose to stay. We all contribute to respectful workplace through our actions, decisions, and the way we treat one another.

Preventing child labor

We believe every child deserves a safe and healthy childhood. That's why we have zero tolerance for child labor or any form of exploitation. We make sure that anyone we employ has reached at least the minimum legal working age, or the age at which compulsory education ends, whichever is higher (UN Convention on the Rights of the Child, ILO Conventions No. 138 and 182 and ILO recommendation No.146).

Prevention of involuntary labor and human trafficking

We strictly oppose and do not tolerate any use of illegal, abusive, forced or bonded labor as well as any kind of human trafficking in our operations or value chain. This includes practices such as coercion, debt bondage, withholding of identity documents, or restricting freedom of movement (ILO Conventions No. 29 and 105). We apply strict due diligence when selecting and working with suppliers and partners.

Fair pay and working hours

We ensure that all employees receive fair compensation that is aligned with local market conditions and reflects the responsibilities of their roles. This includes honoring applicable collective agreements and ensuring equal pay for equal work (ILO Convention No. 100). We respect local laws on maximum working hours and make sure that employees have the rest and recovery time they need (ILO Convention No. 1 and 14).

Freedom of association and expression

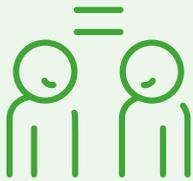
We fully support the right of employees to freely associate and engage in collective bargaining. Every worker has the right, without fear of discrimination or retaliation, to form, join, or support trade unions or other representative bodies of their choice, and to negotiate collectively with their employer (ILO Conventions Nos. 87, 98, 135, and 154). Semperit complies with all applicable laws that protect employee representation and ensures that workers have a voice in workplace matters. We also respect every employee's right to express their views openly and without discrimination throughout their employment.

Safe and substance free workplace

At Semperit, the health, safety, and well-being of our employees come first. Working under the influence of alcohol or illegal drugs is strictly prohibited. These substances can impair judgment, reduce performance, and lead to behavior that may violate our standards or the law. Especially when working in our factories or when commuting to or from our sites, being under influence poses severe safety risks, which we cannot tolerate. If someone appears to be under the influence team leads may take appropriate steps, including a screening, always handled with care and respect to ensure everyone's safety.



THE SEMPERIT PRINCIPLES



Discrimination 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 labor, forced or compulsory labor, human trafficking and other forms of exploitation of human beings **are not tolerated.**



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



LET'S LOOK OUT FOR ONE ANOTHER. A SAFE WORKPLACE STARTS WITH EACH OF US...

- ✔ Treat colleagues and applicants fairly. If you see discrimination, speak up.
- ✔ Think before you act or speak. If something feels disrespectful, it probably is. Report concerns immediately.
- ✔ Be open to different ideas and backgrounds. Inclusion starts with everyday actions—listening, respecting, and collaborating.
- ✔ Provide safe workspace- do not work under substances as you endanger yourself and others.
- ✔ If you work with suppliers, make sure they understand and follow these principles.



NEED HELP?

Contact your team lead, People&Culture or Group Compliance Department at compliance@semperitgroup.com.

EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

At Semperit, we believe everyone deserves to be treated with fairness, dignity, and respect. Each of us brings something unique to the team, and we value those differences. When we make decisions about hiring, training, pay, or promotions, we focus on your skills, performance, and potential. What matters most is the contribution everyone make, not someone's personal background or identity.

We do not tolerate discrimination of any kind. This includes discrimination on the basis of race, ethnic origin, color, gender, age, nationality, language, religion or belief, sexual orientation, gender identity or expression, marital or family status, pregnancy or parental status, citizenship, disability, social origin or caste, union membership, political affiliation, veteran or military status, or any other characteristics protected by applicable law. Our commitment to equality reflects the principles set out in ILO Conventions Nos. 100 and 111 and the UN Convention on the Elimination of All Forms of Discrimination Against Women.

Respectful workplace: no harassment, bullying, or abuse

We all deserve to work in an environment free from harassment, bullying, or abuse. Unwelcome verbal, non-verbal, or physical actions, whether in person, online, or through other means, are unacceptable. Such behavior undermines dignity, causes harm, and creates a hostile atmosphere. We do not tolerate it under any circumstances.

Stronger through diversity, equity, and inclusion

Diversity and inclusion are essential to our success. Different perspectives spark new ideas, drive innovation, and help us work better together. We are proud to be signatories of the [Charter of Diversity](#) and are committed to reducing unconscious bias. Our goal is to build an inclusive culture where everyone feels valued, respected and empowered to contribute their best.

Responsible value chain

Responsibility doesn't stop at our doors. Everyone in our value chain is expected to uphold human rights, fairness and respect. The [Semperit Group Supplier Policy](#) outlines our expectations for ethical conduct, fair working conditions, and compliance with international labor standards.

LEARN MORE

[Human Rights and Modern Slavery Act Statement](#)

[Group Supplier Policy](#)

[People Policy](#)

[Charter of Diversity](#)

[Semperit Annual Report-Sustainability Statement](#)

ENVIRONMENTAL PROTECTION, HEALTH AND SAFETY

Every day, we aim to grow our business in a way that's safe, sustainable and respectful toward each other, our communities and the environment in line with our values, ideals and principles. This means making sure our products and operations meet all applicable environmental laws and standards, and that we always act with care. We extend these standards to our suppliers and other business partners, expecting them to follow environmental laws, meet our internal standards and commit to sustainability, safety and quality.

Protecting the environment

We are constantly looking for better, safer, and more sustainable ways to work. We keep improving how we use energy, raw materials and other resources to prevent pollution of air, water and soil. The same care applies when we build, operate, modify or expand our facilities. Our goal is to minimize waste, reduce our environmental footprint and operate efficiently, using the best technology and practices available.

Occupational safety and wellbeing

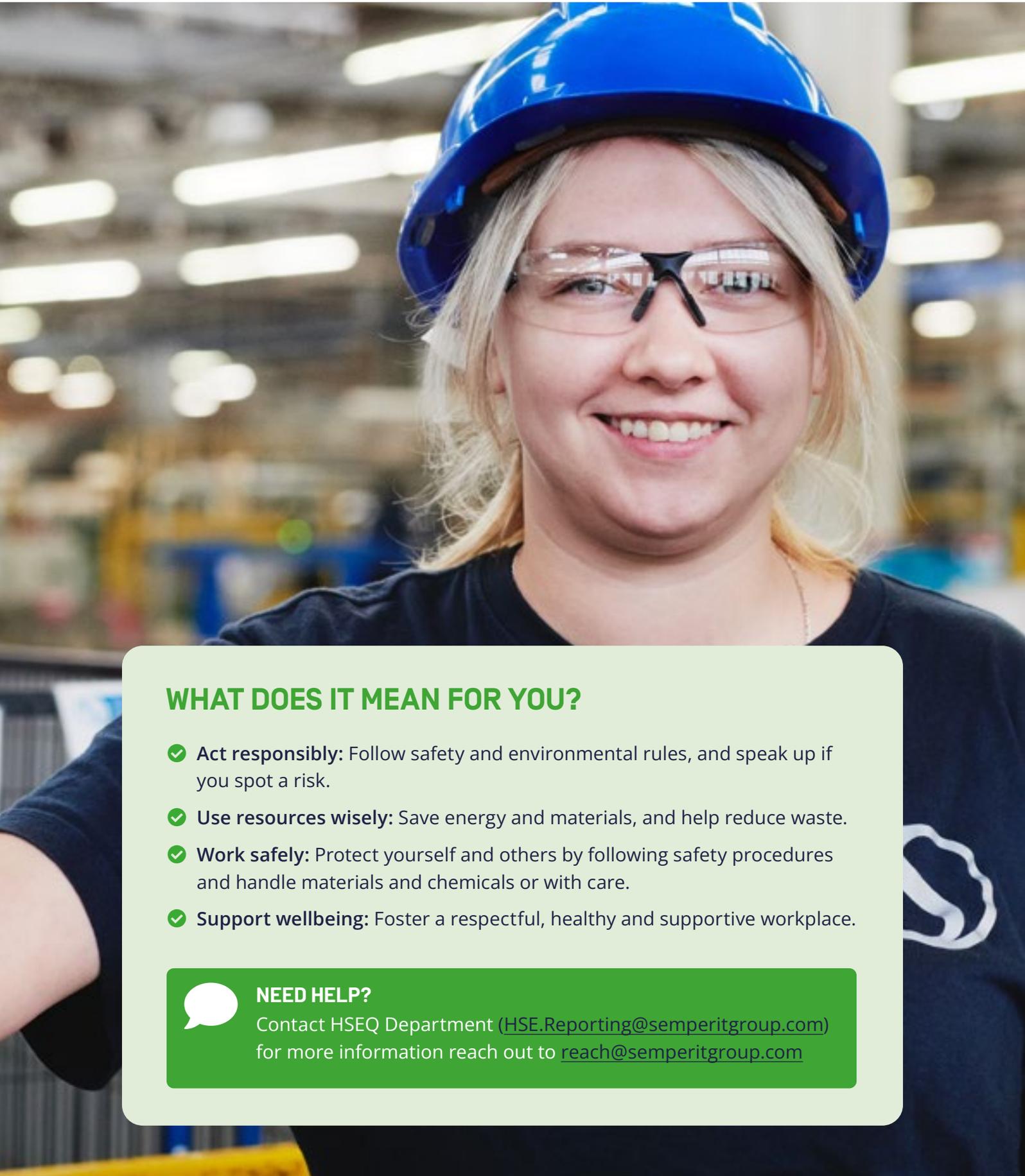
Our [Health, Safety, Environment and Quality Policy](#) focuses on improving physical, psychological and social wellbeing of all employees. Safety isn't just a rule in Semperit, it's a mindset. We want every person to go home safe and healthy every day. We work together to identify and reduce risks, prevent incidents and promote a culture of "zero accidents". We invest in training, provide the right equipment, and constantly review how we can design our processes more safely.

Environmental safety

We ensure our products and processes meet high environmental, chemical safety and workplace safety standards. Semperit complies material regulations such as the REACH regulation to ensure safe use and handling of all materials and works closely with customers, suppliers and regulatory platforms to meet all requirements. At all times, we take care of the safe handling and storage of chemicals and hazardous substances to avoid incidents and emergency situations, in order to minimize the impact on the environment and local communities.

 **LEARN MORE**

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



WHAT DOES IT MEAN FOR YOU?

- ✔ **Act responsibly:** Follow safety and environmental rules, and speak up if you spot a risk.
- ✔ **Use resources wisely:** Save energy and materials, and help reduce waste.
- ✔ **Work safely:** Protect yourself and others by following safety procedures and handle materials and chemicals or with care.
- ✔ **Support wellbeing:** Foster a respectful, healthy and supportive workplace.



NEED HELP?

Contact HSEQ Department (HSE.Reporting@semperitgroup.com)
for more information reach out to reach@semperitgroup.com

PROTECT EACH OTHER AND COMMUNITY

Our work focuses on finding practical, sustainable solutions that protect the environment and support local communities.



Semperit’s ESG guiding principles

E... Environment

Semperit's sustainability strategy involves preventive measures to reduce use of primary resources and protect the environment. By reducing energy intensity and emissions, managing waste effectively, and preventing pollution, that could endanger biodiversity around facilities and along our value chain, we protect the environment, our workforce and local communities.

Circular thinking plays an important role in this. We aim on replacing primary materials with sustainable materials of recycled or biological origin, using resources efficiently and reducing waste. Wherever possible, we recycle materials and end-of-life products and reintegrate recovered materials back into our production processes. Our decarbonization efforts focus on reducing greenhouse gas emissions across our operations by adopting renewable energy sources and enhancing energy efficiency.

S... Social responsibility and inclusion

Semperit recognizes the social challenges of our time, including rising inequality and the effects of demographic change. We take meaningful steps to make a positive impact by promoting diversity, equity and inclusion across our workforce. Building gender-balanced teams and closing the gender pay gap are important goals, and we continue to work toward fair and equal pay at all our sites. Diversity and inclusion, health, safety, and wellbeing are essential parts of how we work, as are respect for human rights and fair labor practices. These principles defined by the [People Policy](#) and [Charter of Diversity](#) shape our culture and our everyday decisions.

G... Strong governance across the value chain

Across our value chain, we focus on strong governance and responsible business conduct. This includes protecting human rights, complying with laws and ethical standards, preventing corruption and bribery, and promoting transparency and sustainability in the supply chain. Our commitment extends beyond our own operations. We work closely with suppliers and business partners to ensure they meet high environmental and social standards and avoid negative impacts in their activities.



LEARN MORE

[People Policy](#)

[Charter of Diversity](#)

[Human Rights and Modern Slavery Act Statement](#)

[Semperit Annual Report–Sustainability Statement](#)

[Sustainability | Group | Semperit](#)

04 WE SAFEGUARD WHAT MATTERS



Protecting company data, personal information and physical assets is part of everyone's job.

Information helps us connect, collaborate and make informed decisions, but it must always be handled with the utmost care. Whether it's product or production details, personal data, or sensitive company information, all must be kept safe from unauthorized access or misuse.

We use and share information only when necessary and always in a secure, responsible way. As we continue to embrace digital tools and technology, we do so thoughtfully and ensure that innovation always goes hand in hand with respect for data protection.

We also protect company property and ensure that our resources are never misused.

Maintaining clear and accurate books, records, and reports, and handling authorizations properly, helps us uphold our commitment to ethical and transparent business practices.



*„Information must be handled
with the utmost care.”*

SENSITIVE INFORMATION

We take all reasonable steps to safeguard our sensitive information. This includes protecting technical or product development information, know-how, intellectual property, financial details, business strategies, customer details, trade secrets, internal communication and any other information, that could harm individual or Semperit if misused, disclosed or lost.

Such information should only be accessed by authorized individuals and shared strictly for legitimate business purposes. Information should never be shared or discussed outside of Semperit or through unsecured devices or channels. Any failure to handle such information responsibly can lead to disciplinary action and may also have legal consequences.

Insider rules

Some of the information we learn through our work might be considered “insider information” under capital markets law. This may include, for example, confidential business plans or trade secrets, financial results, new product launches, or business deals that haven’t been announced yet.

It is strictly prohibited to:

- Buy or sell shares, bonds, or other financial instruments of Semperit Group (or any other company) using insider information.
- Tell someone else to buy or sell based on that information.
- Share that information with anyone who isn’t authorized to know it.
- Doing any of these things is a serious violation of both the law and Semperit Group’s ethical standards.

Artificial intelligence

Artificial Intelligence (AI) is a powerful tool that can enhance productivity, decision-making, and innovation across our organization. We use Artificial Intelligence (AI) responsibly. We

rely only on approved tools for work. Our use of any AI tool must comply with the respective laws of the countries for which the AI product was created and must not conflict with our Code of Conduct.

We must never use any AI without human control. We must ensure that we never enter sensitive or personal data into public AI platforms. These guidelines help safeguard data privacy, uphold compliance standards, and reinforce our commitment to integrity in the digital age.

LEARN MORE

[Data Protection Guideline](#)

[End-User Guideline](#)

[Mobile Device Guideline](#)

[Provider requirements guideline](#)

[Documented Information Guideline](#)

[AI Usage Guideline](#)

[Issuer Compliance Directive](#)

Data protection and privacy

Protection of personal data is enforced through strict laws and regulations. We must handle data with precaution and ensure that we use it only when necessary for work and not share it with unauthorized people.

Personal data protection must be ensured in daily work, when we create new processes or develop. We label private data on company devices as described in our guidelines.

Cyber security

Our daily operations rely heavily on IT systems and the data they manage. We maintain the security and availability of our digital infrastructure by regularly assessing our IT solutions for vulnerabilities and continuously enhancing our technology and processes to stay resilient. We apply additional technical and organizational measures to protect trade secrets and sensitive information to prevent disclosure or loss that would substantially negatively impact our company and others.

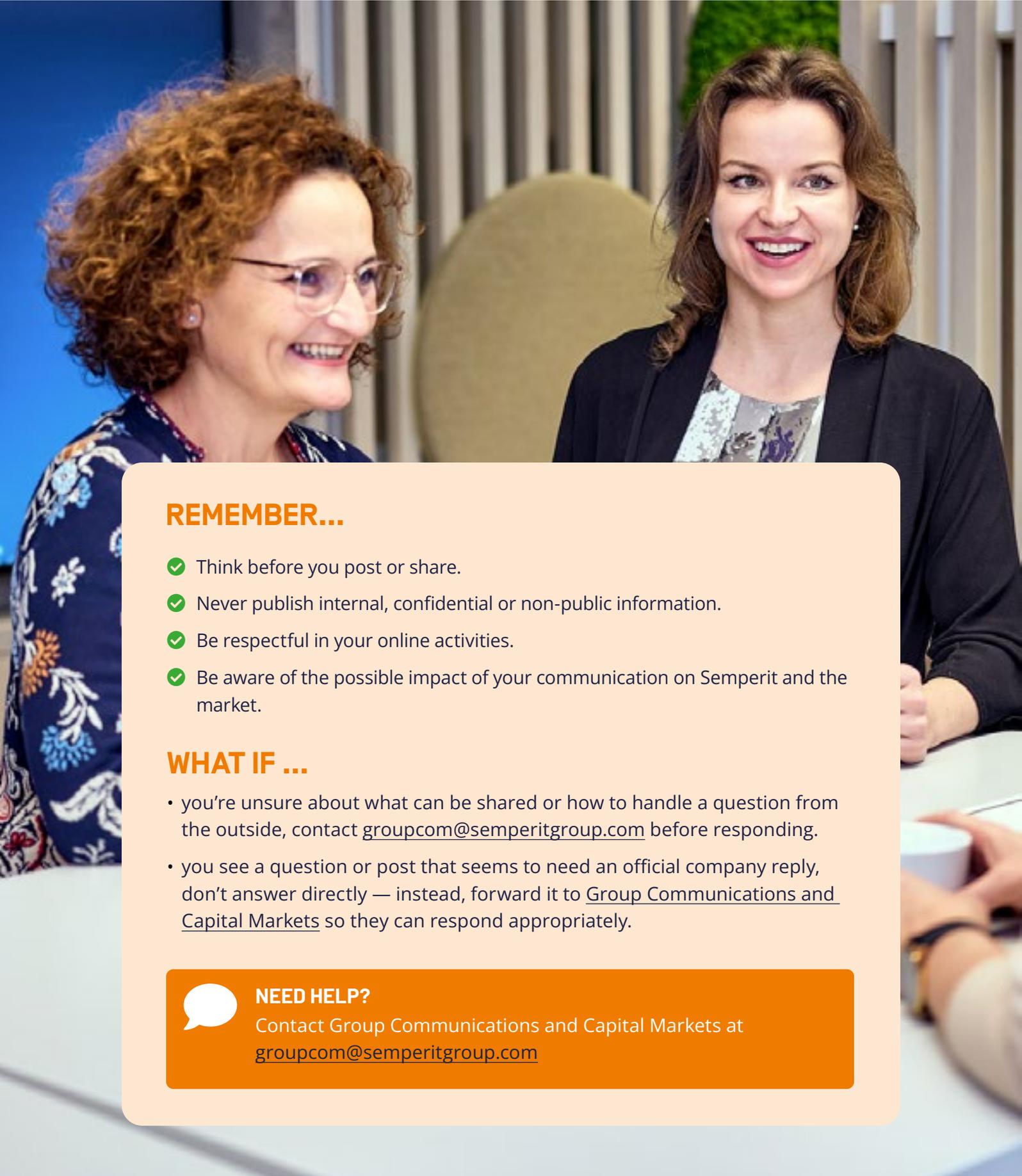
REMEMBER...

- ✓ Do not share any information with externals or misuse information for anyone's private gain.
- ✓ Protect confidential data even after your employment ends.
- ✓ Protect data also when traveling or working remotely and use technology safely.
- ✓ Use AI responsibly and always make sure, you check the creations or content before any internal or external use and mark it properly.
- ✓ Immediately report any actual or suspected misuse of information, cyber incidents, or data breaches via SPOC ticket or at data.privacy@semperitgroup.com or cybersecurity@semperitgroup.com



NEED HELP?

Contact Group Compliance Department (compliance@semperitgroup.com), [Local Data Protection Coordinators](#) or Chief Information Security Officer or cybersecurity@semperitgroup.com.



REMEMBER...

- ✓ Think before you post or share.
- ✓ Never publish internal, confidential or non-public information.
- ✓ Be respectful in your online activities.
- ✓ Be aware of the possible impact of your communication on Semperit and the market.

WHAT IF ...

- you're unsure about what can be shared or how to handle a question from the outside, contact groupcom@semperitgroup.com before responding.
- you see a question or post that seems to need an official company reply, don't answer directly — instead, forward it to [Group Communications and Capital Markets](#) so they can respond appropriately.



NEED HELP?

Contact Group Communications and Capital Markets at groupcom@semperitgroup.com

COMMUNICATIONS

Communicating responsibly

Everything we say in public can influence how people see Semperit — whether it’s in a meeting, an interview, or a social media post. Even when we speak in a personal capacity, others may still see us as representing the company.

That’s why we think before we speak or post. If a topic is sensitive or could affect Semperit’s reputation or the market, we check first with the [Group Communications and Capital Markets Department](#). Only authorized company spokespersons may speak officially on behalf of Semperit, and only information that is already classified as public should ever be shared externally.

Using social media wisely

Social media is part of everyday life, and we respect everyone’s right to use it. However, what we post online, even on personal accounts can reflect on Semperit. That’s why we keep our communication respectful and professional on every social platform, consistent with our values and policies. We avoid commenting on political, religious or

other sensitive topics that could cause misunderstandings or harm Semperit’s reputation. We also never share internal or confidential information online. This includes company data, images, videos, or anything not meant for public release.

Respect and responsibility online

When using social media, we follow the same rules of respect that apply at work. We never use online platforms to harass, discriminate against, or intimidate others. We also respect copyright and privacy laws — we only share content that we have the rights on to use.

Semperit’s logo or brand materials may not be used for private or commercial purposes without prior approval from Group Communications and Capital Markets. Internal issues, complaints or disagreements should never be discussed publicly.

Instead, we raise them with our team leads, our compliance team, or through [SemperLine](#), our hotline to raise compliance concerns.

“We take responsibility for what we share online and always use social media in a respectful way—never to intimidate, harass, or discriminate against colleagues or anyone else.”

LEARN MORE

[Internal and External Communication](#)

[Social Media Guideline](#)

[Documented Information Guideline](#)

INTERNAL CONTROL RULES

Accurate bookkeeping and records

We expect all employees to maintain books and records that truthfully reflect our business and financial position. Every employee is responsible for recording transactions honestly and with integrity and must handle records with care. We fully adhere to all legal obligations related to accounting, financial reporting, and taxation. We place utmost importance on ensuring that all records accurately represent the genuine substance of the transactions and activities they describe.

Four-Eyes Principle

At Semperit, the four-eyes principle is essential to ensure transaction accuracy and 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 binding effect on any Semperit Group entity require the signatures of at least two authorized representatives.

Limits of Authority

We follow the [Limits of Authority](#), which define authorization levels for all business decisions within or on behalf of any Semperit entity. The Limits of Authority apply to all employees and representatives and shall be integrated into each entity's [Rules of Management](#).

Rules of Management

Each entity's General Managers must ensure that entity-specific [Rules of Management](#) are in place, specifying external representation rights (e.g., signing contracts) and aligned with respective Group Guideline.

Internal Control Systems

An [Internal Control System](#) exists at every Semperit entity, regardless of size, region, or

business division. All employees must comply with internal controls across all processes. General oversight lies with Internal Audit, while management of each Semperit entity is responsible for implementation and adherence. Any breach of internal rules must be reported through the available communication channels.

Protecting our resources and property

We are all responsible for safeguarding Semperit's resources, property, and assets. This includes physical property, our production lines and materials we use, equipment, office suppliers, vehicles to financial resources, intellectual property, our brand and confidential information. Company assets must be used responsibly and solely for legitimate business purposes. Unauthorized use, misuse, or damage of company property is strictly prohibited. We must remain vigilant to prevent theft, loss, or their misuse. Same principles apply when we handle property of our business partners or others.

Fraud

Fraud in any form is not tolerated at Semperit. Such as intentional deception, manipulation, or breach of trust for personal, financial, or any other unlawful advantage. All employees are obligated to report any suspicion or evidence of fraudulent behavior immediately to either their team lead or through [SemperLine](#).

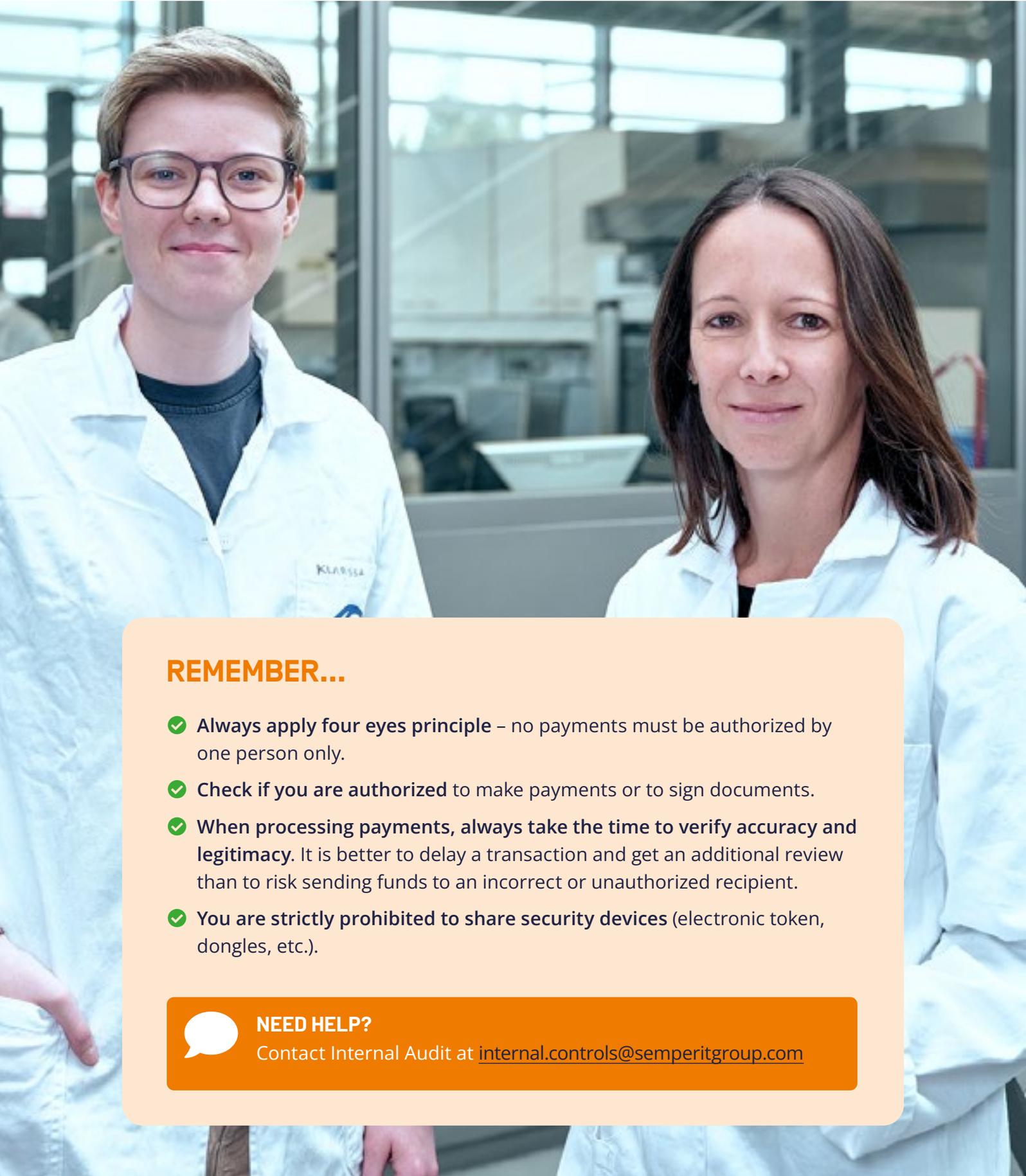
LEARN MORE

[Fraud detection and reporting](#)

[Limits of authority](#)

[Rules of Management](#)

[Payment security](#)



REMEMBER...

- ✓ Always apply four eyes principle – no payments must be authorized by one person only.
- ✓ Check if you are authorized to make payments or to sign documents.
- ✓ When processing payments, always take the time to verify accuracy and legitimacy. It is better to delay a transaction and get an additional review than to risk sending funds to an incorrect or unauthorized recipient.
- ✓ You are strictly prohibited to share security devices (electronic token, dongles, etc.).



NEED HELP?

Contact Internal Audit at internal.controls@semperitgroup.com

Semperit AG Holding

General Counsel

Franz-Michael Hohensinn
franz-michael.hohensinn@semperitgroup.com

Senior Group Compliance Manager

Simona H. Bosiger
simona.h.bosiger@semperitgroup.com

Compliance Department

compliance@semperitgroup.com

Chief Information Security Officer

Christian Popp
christian.popp@semperitgroup.com

Internal Controls (fraud)

internal.controls@semperitgroup.com

Group Treasury (payment fraud)

GroupTreasury.Vienna@semperitgroup.com

Group Communications and Capital Markets

groupcom@semperitgroup.com

Data privacy

data.privacy@semperitgroup.com

Address

Am Belvedere 10
1100 Vienna, Austria
www.semperitgroup.com

All references to people are gender neutral.
References to internal documents and their links are available only to internal stakeholders.
Language quality was enhanced with the support of intelligent editing technologies.

Semperit Group refers to Semperit AG Holding and all its fully owned subsidiaries.

© Semperit AG Holding

This Code of Conduct is applicable to the Semperit Group, including the Rico Group.

SEMPERIT 



www.semperitgroup.com