



# CODE OF CONDUCT

Sico Group



**WE ACT WITH INTEGRITY. WE FORM A SUSTAINABLE FUTURE.  
WE TAKE RESPONSIBILITY. WE CREATE INNOVATION.**

We live from the trust of our customers, employees, owners and the public, as well as the performance and integrity of our group.

As a global supplier of high-quality silicon and quartz components for the semiconductor industry, we are responsible for sustainable and compliant business practices along the entire value chain.

An important element of our success story is that we have always seen responsible and lawful-conduct as an indispensable part of our corporate culture. We make no compromises when it comes to morals, ethics and safety. We can only expect social acceptance for our business and projects if we act in accordance with the rules at all times and in all places. The integrity of each individual is key to the success of our company. Lawful and ethical conduct protects against significant legal and economic risks and strengthens the reputation of and trust in our company. We explicitly commit to the principles of the Responsible Business Alliance (RBA).

The Code of Conduct explains the main principles of compliant and ethical behaviour. The Code of Conduct is substantiated by guidelines that build on it.

If you are uncertain about how to act in a certain situation or require advice, please contact the compliance organisation, which will be happy to help you.

Let us work together to ensure the reputation and economic success of the Sico Group in a sustainable way by adhering to the rules in our business practices and acting with integrity in our daily business.

INNOVATION – PRECISION – RELIABILITY

CUSTOMER FOCUS – EXCELLENCE – RESPONSIBILITY

Management of Sico Group

Our Code of Conduct summarises binding rules for behaviour that we expect **all companies of Sico Group** to follow.

This Code of Conduct is intended for anybody employed by Sico Group under a contract of employment, but also anybody who is accountable to Sico Group on the basis of another legal relationship, such as a consultant contract, commercial agency contract or subcontracted worker contract.

**For us, it is a matter of course that anybody acting in the various different group companies follows the laws and regulations of the states where they are working and fulfils their obligations in a reliable manner.**

They must demonstrate sincerity and fairness in all aspects of their business activity. We expect environmental and social responsibility towards our own business, customers, suppliers and other business partners.



**We have developed a „Code of Conduct“ for **EVERYONE**, regardless of national borders, culture and language. The Code of Conduct establishes ethical and moral principles as well as our intra-group guidelines - sticking to them is our top priority!**



# INTEGRITY & COMPLIANCE WITH THE REGULATORY FRAMEWORK

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The integrity of each individual is essential for gaining and keeping the trust of our customers, suppliers and owners. Moreover, this is the only way to avoid serious legal and economic risks. **We are unreservedly committed to behaving with integrity and complying with the law.** We would rather miss out on a deal and on achieving an internal objective than violate applicable law.

We follow existing laws, official regulations and intra-group guidelines. If the regulations of national laws are stricter than our internal regulations, national law takes precedence.

It is natural for us to protect our investments and handle them with care and to not use or appropriate them improperly or illegally to our own ends. Unlawfully taking, embezzling or abusing financial and material resources of our company harms all of us.



We are expressly committed to the principles of the Responsible Business Alliance (RBA). Therefore, this Code of Conduct on pages 4-18 contains the principles of the Responsible Business Alliance Version 8.0 (2024).

# A LABOR

We commit to respect the human rights of workers, and to treat them with dignity. This applies to direct and indirect suppliers, as well as all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The labor standards are as follows:

## 1. Prohibition of Forced Labor

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, workers' dormitories or living quarters.

As part of the hiring process, all workers must be provided with a written employment agreement in their native language, or in a language the worker can understand, that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts. We maintain documentation on all leaving workers. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Notwithstanding the foregoing, employers can only hold documentation if necessary to comply with the local law. In this case, at no time shall workers be denied access to their documents.

Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

## **2. Young Workers**

Child labor shall not be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. We ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. We implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. We provide appropriate support and training to all student workers.

In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation shall be provided.

## **3. Working Hours**

Working hours shall not exceed the maximum set by local law. Further, a workweek shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime shall be voluntary. Workers shall be allowed at least one day off every seven days.

## 4. Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.

## 5. Non-Discrimination/Non-Harassment/Humane Treatment

We commit to a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. This was drafted in consideration of ILO Discrimination (Employment and Occupation) Convention (No.111).

## 6) Freedom of Association and Collective Bargaining

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with these principles, we shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

## HEALTH AND SAFETY

We recognize that in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy working environment enhances the quality of products and services, consistency of production and worker retention and morale. We also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace. The health and safety standards are as follows:

### 1. Occupational Health and Safety

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) shall be identified and assessed, mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.

### 2. Emergency Preparedness

Potential emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

### **3. Occupational Injury and Illness**

Procedures and systems shall be in place to prevent, manage, track and report occupational injuries and illnesses, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. We allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

### **4. Industrial Hygiene**

Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. We provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. We provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

### **5. Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks shall be identified, evaluated, and controlled.

### **6. Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards,

interlocks, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.

## **7. Sanitation, Food, and Housing**

Workers shall be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

Worker dormitories provided by Sico Group or a labor agent shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, and adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

## **8. Health and Safety Communication**

We provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards.

Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable.

Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

# C ENVIRONMENT

Across all business functions, we recognize that environmental responsibility is integral to producing world-class products. We identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources, while safeguarding the health and safety of the public. The environmental standards are as follows:

## **1. Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept current and their operational and reporting requirements shall be followed.

## **2. Pollution Prevention and Resource Conservation**

Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

## **3. Hazardous Substances**

Chemicals, waste, and other materials posing a hazard to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.

## **4. Solid Waste**

We implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.

## 5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone- depleting substances shall be effectively managed in accordance with the Montreal Protocol and applicable regulations. We conduct routine monitoring of the performance of its air emission control systems.

## 6. Materials Restrictions

We adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

## 7. Water Management

We implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. We conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

## 8. Energy Consumption and Greenhouse Gas Emissions

We establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. We look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

# D ETHICS

To meet social responsibilities and to achieve success in the marketplace, we and their agents shall uphold the highest standards of ethics including the following:

## **1. Business Integrity**

The highest standards of integrity shall be upheld in all business interactions. We have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

## **2. No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

## **3. Disclosure of Information**

All business dealings shall be transparently performed and accurately reflected on the Sico Groups business books and records. Information regarding our labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

## **4. Intellectual Property**

Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.

## 5. Fair Business, Advertising and Competition

Standards of fair business, advertising, and competition shall be upheld.

## 6. Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers<sup>1</sup> shall be maintained, unless prohibited by law. We have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

## 7. Responsible Sourcing of Minerals

We adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold, and cobalt in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

## 8. Privacy

We commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. We comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

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<sup>1</sup> Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

# E MANAGEMENT SYSTEMS

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We adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with

- (a) compliance with applicable laws, regulations and customer requirements related to our operations and
- (b) conformance with this Code; and
- (c) identification and mitigation of operational risks related to this Code.

It shall also facilitate continual improvement. The management system shall contain the following elements:

## **1. Company Commitment**

We establish human rights, health and safety, environmental and ethics policy statements affirming our commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.

## **2. Management Accountability and Responsibility**

We clearly identify senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

## **3. Legal and Customer Requirements**

We adopt or establish a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

#### **4. Risk Assessment and Risk Management**

We adopt or establish a process to identify the legal compliance, environmental, health and safety, labor practice and ethics risks, including the risks of severe human rights and environmental impacts, associated with our operations. We determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

#### **5. Improvement Objectives**

We shall establish written performance objectives, targets and implementation plans to improve our social, environmental, and health and safety performance, including a periodic assessment of our performance in achieving those objectives.

#### **6. Training**

We establish programs for training managers and workers to implement our policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

#### **7. Communication**

We shall establish process for communicating clear and accurate information about our policies, practices, expectations, and performance to workers, suppliers, and customers.

## **8. Worker/Stakeholder Engagement and Access To Remedy**

We establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code, and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation. Verbesserung zu fördern. Den Arbeitnehmern wird ein sicheres Umfeld geboten, in dem sie ohne Angst vor Repressalien oder Vergeltungsmaßnahmen Beschwerden und Rückmeldungen vorbringen können.

## **9. Audits and Assessments**

We conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

## **10. Corrective Action Process**

We establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

## **11. Documentation and Records**

We create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

## **12. Supplier Responsibility**

We establish a process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

## HEALTH, SAFETY & EQUAL TREATMENT

It is very important to us that our employees can work in a safe and non-discriminatory environment. **We promote an environment of mutual respect, appreciation and tolerance.** We do not tolerate discriminatory or disrespectful behaviour. We promote equal opportunities and prevent discrimination when appointing employees and promoting and offering training and further training measures. We treat everybody equally, regardless of age, gender, skin colour, ethnic affiliation, sexual identity, disability, religion or world view.

**We fulfil our responsibility with regard to health and safety at work**, because the health and safety of our employees is our top priority. Occupational safety and health protection are part of all operations and every individual is required to avoid endangering people or the environment, to minimize environmental impacts and to careful use of resources. Legal and internal guidelines on occupational safety, fire safety, health and environmental protection must be adhered to.

**We respect internationally recognised human rights** and we are particularly committed to adhering to the UN Human Rights Charter and the Core Labour Standards of the International Labour Organisation. We strictly reject any form of forced or child labour. We recognise the right of all employees to appropriate remuneration. Pay and other benefits correspond at least to the legal standards nationally and locally.

**Our environment matters to us.** That's why we take protecting the environment seriously and why we are committed to adhering to all environmental laws, regulations and regulatory requirements. Over and above this minimum standard, we constantly work on improving our environmental performance. We strive to prevent or reduce the environmental impact as far as possible of the activities carried out at our production facilities by using the best available technology not entailing excessive costs.

We aim to purchase fuels and raw materials that conserve natural resources to a greater extent where their use is feasible both in terms of ecology and economy. To monitor and minimise environmental impact, especially in the area of emissions and waste treatment, we implement environmental and waste management.

We encourage our employees to be environmentally aware in their actions and involve them in measures to improve environmental standards. We also take precautions to ensure that any third parties working at our premises comply with our environmental policy.



**People and the environment are our top priority! Every individual is required to avoid endangering people and the environment, to minimizing environmental impacts and to careful use of resources.**



## REFUSAL OF CORRUPTION & BRIBERY

In general, corruption is understood to mean the abuse of entrusted power for private gain or benefit, both in the public and private sector. Corrupt behaviour can not only have serious consequences for our business and every individual, it also ultimately harms society as a whole. **We do not tolerate any kind of corrupt behaviour or white-collar crimes in connection with any kinds of business activity.**

It is essential for our business activity that we are independent and unsusceptible to influence. We therefore avoid any circumstances that could influence our impartiality or even that could make it appear as if we were being influenced.

This means that we do not give, promise or accept direct or indirect advantages that are likely to unduly influence decision-making processes or business activities or even just give the appearance of such influence. Business interests and private interests are obviously kept strictly separate. Only low value gifts that are customary in business are unproblematic. Gifts of money and non-cash benefits will never be offered or accepted. We act with special caution when dealing with public officials.

We adhere to the internal anti-corruption guidelines as well as our processes for dealing with gifts and invitations. Doubts in relation to gifts that have been received or given must be cleared up with the superiors or the Compliance Organisation beforehand.



**We thrive on the trust of our stakeholders in the performance and the integrity of all employees.**



# AVOIDANCE OF CONFLICTS OF INTEREST

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In our daily business, situations may arise where personal interests conflict with the interests of the company. In the worst case, these situations can even have a negative impact on the performance of our duties and tasks.

**We always act in the best interests of the company.** We call upon all employees to avoid situations where their personal and/or financial interests come into or could come into conflict with the interests of Sico Group. We even avoid situations that just give the impression that our business decisions could be influenced by personal interests. Nevertheless, conflicts of interest cannot always be avoided. We inform our superiors about possible conflicts of interest fully, immediately and without being asked. This enables us to ensure the appropriate transparency and to adequately resolve conflicts of interest.

## DONATIONS & SPONSORSHIP

We see ourselves as an active member of society so we get involved in various different ways. **Donations and sponsorship activities must only serve the interests of the business** and must strictly be kept separate from private interests. In particular, such activities must not be offered or granted in return for an official performing their duty or for a decision of a representative of the business.

We do not make any financial contributions, especially donations or sponsorship, to political parties domestically or abroad, individual members of parliament or candidates for political offices. Furthermore, we do not participate in projects that violate laws, generally accepted standards or our values and principles.

Our business activities are based on our commitment to fair competition. We also expect our employees and business partners to adhere to the applicable national, European and international competition and anti-trust regulations.

We do not get involved in any activities that limit fair competition. In particular, we do not make any arrangements with competitors concerning prices or other conditions or arrangements on sharing markets, customer segments or products. We also do not pass on any confidential information that would be likely to restrict or distort fair competition and we expressly reject any unfair competition practices.

We also behave fairly towards our suppliers, customers and other business partners and do not illegally restrict their market presence. We do not abuse our position on markets where we are dominant.

# CHOICE OF BUSINESS PARTNERS

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Business partners such as suppliers, customers, consultants or representatives are part of our business activity and carefully chosen by us. **Our cooperation with our business partners is fair and transparent and we expect the same amount of transparency and integrity from them.**

Business partners' actions can be attributed to Sico Group. When developing new business relationships, it is therefore absolutely essential to get enough information to be able to assess the integrity and trustworthiness of the business partner. This can be done by consulting public sources or registers or by asking for references, self-declarations and assessments.

In order to guarantee that we treat all of our business partners fairly, a transparent commercial basis and appropriate payment are a matter of course for us. In particular, no disproportionate commissions or fees can therefore be agreed or paid.



**We respect fair competition and do not undertake any activities that restricts this. We know our business and trading partners and value transparency - for fair and equal dealings with each other.**



## PROTECTION OF DATA & INFORMATION

Data and information are valuable property. We only process personal data as permitted by law and we are aware of the high degree of sensitivity of the personal data entrusted to us by customers, employees, shareholders and suppliers.

The security of personal data and confidential information, as well as business and trade secrets, can have a direct influence on our business success and our public image. **For that reason, we protect personal data and confidential information with careful and responsible handling** and with all of the technical and organisational measures available to us against loss, unauthorised use and abuse or unintentional destruction. To this end, we adhere to the internal company IT-policies and applicable works agreements.



**We treat confidential information with the utmost care and do not communicate it externally unless this is necessary.**  
**We deal with any external communication responsibly and strive for correct and honest communication.**



# RESPONSIBLE COMMUNICATION

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**We are committed to responsible and proper communication.** Consistent and honest communication guarantees trust in our business. We therefore value transparent and truthful reporting and communication about the company's business processes in respect of investors, employees, business partners, the public and state institutions. Each individual ensures that both internal and external reports, records and other documents of Sico Group are in accordance with the applicable legal regulations and standards and that they are therefore always done completely and correctly.

**We act and communicate responsibly on social media and in online communities.** We do not pass on any confidential information or make any statements that are likely to damage the reputation of Sico Group. Each individual should be aware that he or she can still be seen as part of Sico even in private and is therefore asked to safeguard the reputation of the business through their behaviour and appearance in public, especially with respect to the media.

Business information for the public and official statements are only published by the departments designated for this purpose.

You might be unsure about what to do in certain situations. It is important to make use of advice and support for any questions or uncertainties or if you see or suspect incorrect behaviour.

In this case, you should contact your superiors or the Compliance Organisation (see below) in confidence.

## Reporting Infringements

In the event of violations of our Code of Conduct, everybody is called upon to inform their [superiors or the Compliance Organisation](#). In cases that might concern the local management itself, only the [Compliance Department](#) should be informed.

Reports can also be made anonymously via our [Compliance Whistleblower System „Tell it Cody“](#). Every report received will be carefully examined and treated in confidence by the Compliance Organisation.

We promise special protection and support for every individual who makes an honest and justified complaint or report. Sanctions cannot be made against whistleblowers on the basis of a report alone. This is also the case if information proves to be incorrect as long as it was provided in good faith.

## Consequences of Violations

Violations of these standard rules of conduct and principles cause us lasting harm and can entail [all kinds of consequences and sanctions](#). These include financial and criminal law consequences that not only have negative impacts on the group as a whole but also on each individual.

For that reason, Sico actively deals with any infringements of the terms of the Code of Conduct and takes appropriate measures to clarify the situation. Non-compliance can entail measures under criminal, civil and labour law.



# COMPLIANCE ORGANISATION OF WIETERSDORFER GRUPPE AND SICO GRUPPE

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## Compliance Department

compliance@wietersdorfer.com  
Tel.: +43 463 566 76 8029  
Ferdinand-Jergitsch-Straße 15  
9020 Klagenfurt am Wörthersee

**Mirna Zwitter-Tehovnik**  
Head of Legal, Compliance and Insurances  
mirna.zwitter@wietersdorfer.com  
Mobile: +43 664 6124360

## Compliance Ambassador

### Sico Technology GmbH

Industriestrasse 4  
9241 Wernberg

**Gerd Peterzell**  
Head of Global IT  
ambassador@sico-tec.com  
Mobile: +43 699 142 44 555

