

## **SEMPA SYSTEMS GmbH - CODE OF CONDUCT**

The Dresden-based company SEMPA SYSTEMS GmbH is a manufacturer and installer of innovative ultra-pure media supply systems, also for specific applications. Customers include major companies in the semiconductor and LED industries as well as representatives from the photovoltaic and pharmaceutical industries.

The company aligns its business actions and decisions with universally accepted ethical values, particularly integrity, credibility, and respect for human dignity. It promotes transparency, responsible leadership, and control within the company in an appropriate manner.

This Code of Conduct sets out binding rules that must be observed by every employee of the company. It serves as the foundation and guide for addressing ethical and legal challenges in daily work. Every employee can address questions and concerns in this regard to their supervisor, the HR department, or the management. In particular, the members of the management and all executives have a role model function and are responsible for compliance with this code and its standards according to a defined management system.

The company expects its suppliers to adhere to the guiding principles of the Code of conduct, supports them in this regard, and encourages them to do the same in their supply chains.

The company complies with the laws and other legal regulations of the countries in which it operates. This expressly applies to embargo, customs, and export control regulations.

The code consists of five sections. Sections A, B, and C establish standards for labor, health and safety, and the environment. Section D contains standards in business ethics, while Section E outlines the elements of an acceptable system for managing compliance with this code.

## SCOPE AND REPORTING OF VIOLATIONS

Compliance with these rules is an essential part of our corporate culture. The guidelines listed below serve as framework conditions for cooperation with our employees, customers, suppliers, and other companies with whom we interact. Regardless of the person and position in the company, the following guidelines must be adhered to. Therefore, we explicitly encourage our leaders to lead by example and contribute to compliance with the guidelines.

**Sanctions for Violations:** Violations of these compliance guidelines may result in disciplinary measures, including possible termination of employment. In addition, violations may also have legal consequences.

The guidelines are subject to continuous review and updating to ensure they comply with current laws and regulations.

**Reporting Violations:** We strongly encourage our employees to report any concerns regarding legal or ethical issues without fear of reprisal. Reports can be treated confidentially and should be directed to the designated contact point.

The primary contact person is the respective supervisor and the HR department. Additionally, there is the option to use the whistleblower system at

<https://www.sempa.de/de/impressum-datenschutz>.

### A. LABOR

SEMPA SYSTEMS GmbH commits to upholding the human rights of its employees and treating them with dignity and respect according to international standards. This applies to all employees, including temporary, migrant, student, contractual, direct employees, and any other type of worker. Recognized standards, as listed below, have been used as a reference in the creation of the code and can serve as a useful source of additional information.

The labor standards are as follows:

#### 1. Freely Chosen Employment

We are committed to upholding internationally recognized human rights and ensure their compliance in all our corporate practices. We strictly reject forced, involuntary prison labor, slavery, or human trafficking. This includes the transportation, accommodation, recruitment, transfer, or receipt of persons by means of threat, violence, coercion, abduction, or fraud for labor or services. There shall be no unreasonable restrictions on the movement of employees within the facility or unreasonable restrictions on entering or leaving the facilities provided by the company. All work must be voluntary, and employees must be able to leave work or terminate their

employment. Employers and agents must not retain or destroy, conceal, confiscate, or deny access to employees' identity or immigration documents unless such retentions are legally required. Employees must not be required to pay recruitment fees to employers or agents or any related fees for their employment. If such fees have been paid, they must be reimbursed to the employee.

## 2. Child Labor

Child labor shall not be used at any stage of the work process. The term "child" refers to any person under 15 years of age or under the age for completing compulsory education, or under the minimum age for employment as defined by local law, whichever is highest. The use of legitimate workplace learning programs that comply with all laws and regulations is supported. Employees under 18 years of age shall not perform any work that could jeopardize their health or safety, including night shifts and overtime. The employer must ensure the proper treatment of students by maintaining proper study materials, carefully vetting educational partners, and protecting the rights of students in accordance with applicable laws and regulations. The employer must provide appropriate support and training for all students. Under local laws, the wage rate for students, interns, and apprentices must be at least the same as the wage rate for other entrants performing equivalent or similar tasks.

## 3. Working Hours

Studies of business practices clearly show that heavy workloads can lead to reduced productivity, increased turnover, and increased injuries and illnesses among workers. The workweeks must not exceed the maximum set by local law. Employees must be granted at least one day off every seven days.

## 4. Wages and Benefits

The compensation paid to workers must comply with all applicable wage regulations, including those relating to minimum wages, overtime, and legally mandated benefits. In accordance with local laws, employees should be compensated for overtime at rates higher than regular hourly rates. Likewise, overtime may be compensated through equivalent time off. Deductions from wages as disciplinary measures are not allowed. In each pay period, employees shall receive timely and understandable pay statements containing sufficient information to verify the correct compensation for work performed. The use of temporary, seconded, and outsourced labor must comply with local legal limits.

## 5. Humane Treatment

There shall be no harsh and inhumane treatment, including sexual harassment, sexual abuse, physical punishment, the use of mental or physical coercion, or verbal abuse. The threat of such treatment is also prohibited. Disciplinary policies and procedures to support these requirements must be clearly defined and communicated to employees.

## 6. Non-Discrimination

The employer should commit to employment without harassment and unlawful discrimination. Companies must not discriminate based on race, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, protected genetic information, or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Additionally, employees or prospective employees should not be subjected to medical tests or physical examinations that could be used in a discriminatory manner.

## 7. Freedom of Association

In accordance with local law, the employer shall respect the right of all employees to establish and join unions of their own choice, to collectively bargain and to peacefully assemble, as well as the right to engage in such activities. Employees and/or their representatives shall be able to openly communicate ideas and concerns regarding working conditions and management practices without fear of discrimination, retaliation, intimidation, or harassment.

## B. HEALTH AND SAFETY

SEMPA SYSTEMS GmbH acknowledges that, in addition to minimizing work-related injuries and illnesses, a safe and healthy workplace enhances the quality of products and services, ensures production continuity, and improves employee retention and morale. Our company also recognizes that continuous training and education are essential to identifying and resolving health and safety issues in the workplace.

Recognized management systems such as ISO 45001 and the ILO guidelines on occupational safety and health were used as references in the creation of the code and can be a useful source of additional information.

The standards for health and safety are:

### 1. Occupational Safety

The protection of employees from potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) shall be controlled through appropriate design, engineering and administrative controls, preventive maintenance, and safe work procedures (including lockout/tagout), as well as ongoing safety training. If hazards cannot be adequately controlled through these means, appropriate personal protective equipment and information materials on the risks associated with these hazards shall be provided to employees. Employees shall be encouraged to voice safety concerns. Bullying is not tolerated in our company. If violations occur, we ask that they be reported to management, the HR department, or through the whistleblowing system. Consequences will be enforced for violations.

## 2. Emergency Preparedness

Potential emergency situations and events shall be identified, assessed, and their impacts minimized through the implementation of emergency plans and response procedures. This includes reporting emergencies, notification and evacuation procedures, training and drills, adequate fire detection and suppression, sufficient escape routes, and recovery plans. Such plans and procedures shall aim to minimize damage to life, the environment, and property.

## 3. Occupational Injuries and Illnesses

Procedures and processes shall be in place to prevent, record, and report occupational injuries and illnesses, including provisions for reporting, classifying, and recording injury and illness cases, providing necessary medical treatment, investigating and implementing corrective actions to eliminate causes, and promoting the return of employees to work.

## 4. Occupational Hygiene

Hazards related to chemical, biological, and physical substances shall be identified, assessed, and controlled. If hazards from such substances cannot be adequately controlled, employees' health shall be protected through personal protective equipment.

## 5. Physically Demanding Work

The hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and frequently repeated or forceful assembly tasks, shall be identified, assessed, and controlled.

## 6. Machine Guarding

Production and other machines shall be assessed for safety hazards. Physical safeguards, interlocks, and barriers shall be installed and properly maintained if machines present a risk of injury to operators.

## 7. Sanitary, Food, and Living Conditions

Employees shall have easy access to clean toilet facilities, drinking water, and hygienic facilities for food preparation, storage, and consumption. Accommodations provided by the employer shall be clean and safe, with adequate emergency exits, hot water for bathing and showering, sufficient heating and ventilation, and adequate personal space and privacy.

## 8. Health and Safety Communication

The company is committed to providing employees with appropriate occupational health and safety training in their primary language. Health and safety-related information shall be prominently displayed in the facility.

## C. ENVIRONMENT

The SEMPA SYSTEMS GmbH acknowledges that environmental responsibility is an integral part of producing high-quality products. In the manufacturing processes, adverse effects on the community, the environment, and natural resources should be minimized, and the health and safety of the public protected. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) have been used as references in the development of the code and can be a useful source of additional information.

The following environmental standards apply:

### 1. Environmental permits and reporting

All necessary environmental permits (e.g., wastewater monitoring) are obtained, retained, and kept current, and their operational and reporting requirements are met.

### 2. Pollution and resource waste prevention

The consumption of resources and the generation of all types of waste, including water and energy, should be reduced or eliminated, for example, by modifying production, maintenance, and facility processes, material substitution, conservation, recycling, and reuse.

### 3. Hazardous substances

Chemicals and other materials posing a risk upon release should be identified. Safe handling, movement, storage, use, reuse (recycling), and disposal must be ensured.

### 4. Wastewater and solid waste

The company has a plan to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Wastewater potentially generated by operational and industrial processes should be treated to the above standards before discharge or disposal. Additionally, measures should be taken to reduce wastewater generation. The employer should regularly monitor wastewater treatment systems.

## 5. Air emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated by operational processes should be characterized, regularly monitored, controlled, and treated before discharge accordingly. The company should regularly monitor its systems for controlling air emissions.

## 6. Material restrictions

The company shall comply with all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of certain substances in products and manufacturing processes, including labeling for recycling and disposal.

## 7. Energy consumption and greenhouse gas emissions

Energy consumption and greenhouse gas emissions should be reduced to an appropriate minimum.

# D. BUSINESS ETHICS

To fulfill social responsibilities and achieve success in the market, SEMPA SYSTEMS GmbH is committed to upholding the highest ethical standards, including:

### 1. Business Integrity

The highest standards of integrity must be upheld in all business interactions. SEMPA SYSTEMS GmbH has a zero-tolerance policy prohibiting any form of bribery, corruption, extortion, and embezzlement. All business relationships should be conducted transparently and accurately reflected in business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

### 2. No Improper Advantage

Bribery or other means to obtain undue or unlawful advantage shall not be promised, offered, authorized, provided, or accepted—directly or indirectly through a third party—to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

### 3. Disclosure of Information

Information regarding labor, health and safety practices, environmental practices, business activities, structure, financial situation, and performance must be disclosed in accordance with applicable regulations and industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.

#### 4. Intellectual Property

Intellectual property rights must be respected, and the transfer of technology and know-how must occur in a manner that protects intellectual property rights. Similarly, customer data must be protected.

#### 5. Fair Business Operations, Advertising, and Competition

Standards for fair business operations, advertising, and competition must be adhered to. Adequate means to secure customer data must be available.

#### 6. Protection of Identity

Programs ensuring confidentiality, anonymity, and protection of supplier and employee whistleblowers shall be maintained unless prohibited by law.

#### 7. Responsible Use of Raw Materials

SEMPA SYSTEMS GmbH ensures, in a reasonable manner, that our suppliers contribute to fair conditions along the supply chain. This particularly applies when tantalum, tin, tungsten, and gold are used in the products supplied by them, which do not directly or indirectly finance or favor armed groups committing serious human rights abuses in the Democratic Republic of the Congo or an adjacent country. Due diligence regarding the origin and record chain of these raw materials shall be carried out and made available to customers upon request.

#### 8. Data Privacy

SEMPA SYSTEMS GmbH commits to protecting the legitimate data privacy expectations of personal information of all business partners, including suppliers, planners, customers, as well as employees. The company adheres to data privacy and information security laws and regulatory requirements when collecting, storing, processing, transferring, and sharing personal information. As a globally operating company, the use of modern information technologies is of paramount importance to our business processes.

### E. MANAGEMENT SYSTEM

The SEMPA SYSTEMS GmbH has established a management system, the scope of which pertains to the content of this code. The management system is designed to ensure:

(a) Compliance with applicable laws, regulations, and customer requirements regarding the company's operations and products.

(b) Conformity with this code.



(c) Identification and mitigation of operational risks related to this code.

(d) It promotes continuous improvement.

The management system includes the following elements:

#### 1. Corporate Commitment

Statements on corporate, social, and environmental responsibility approved by management and published in the facility's local language.

#### 2. Management Responsibility and Authority

Clear identification of senior management and company representatives responsible for implementing management systems and associated programs.

#### 3. Legal and Customer Requirements

Process for identifying, monitoring, and understanding applicable laws, regulations, and customer requirements, including the requirements of this code.

#### 4. Risk Assessment and Risk Management

Process for identifying risks associated with SEMPA SYSTEMS GmbH's operations related to legal compliance, environment, health and safety, as well as labor practices and ethics. Determination of the relative significance of each risk and implementation of appropriate procedural and physical controls to manage identified risks and ensure compliance with legal regulations.

#### 5. Improvement Objectives

Written performance objectives, targets, and implementation plans to improve SEMPA SYSTEMS GmbH's social and environmental standards, including periodic evaluation of performance in achieving these goals.

#### 6. Training

Training programs for managers as well as employees to implement policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

#### 7. Communication

Process for providing clear and accurate information on SEMPA SYSTEMS GmbH's policies, practices, expectations, and performance to its employees.

## 8. Employee Feedback and Participation

Ongoing processes to assess employees' understanding and solicit feedback on the practices and conditions covered by this code to promote continuous improvements.

## 9. Audits and Assessments

Periodic self-assessments to ensure compliance with legal and regulatory requirements, the content of the code, and customers' contractual requirements related to social and environmental responsibility.

## 10. Corrective Action Process

Process for promptly addressing deficiencies identified through internal or external assessments, inspections, investigations, and reviews.

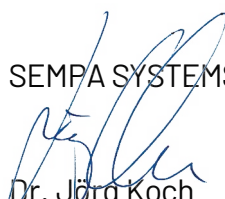
## 11. Documentation and Records

Creation and updating of documents and records to ensure legal compliance and compliance with corporate requirements, as well as appropriate confidentiality to protect privacy.

## F. CONCLUDING REMARKS

SEMPA SYSTEMS GmbH places a high priority on compliance with laws, regulations, and ethical behavior in all business activities. We expect all employees to respect and integrate this policy into their daily actions. We encourage all employees to discuss any questions or concerns regarding compliance with this policy or other compliance issues.

The Code of Conduct comes into effect on March 14, 2024.

SEMPA SYSTEMS GmbH  
  
Dr. Jörg Koch  
Managing Director