



HANSAMATRIX

Inspired by your trust

ETHICS AND ANTI-CORRUPTION POLICY

Version 3.0



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Policy objectives

1. As a socially responsible and sustainability-oriented company, HansaMatrix has a duty to its employees and to society as a whole to maintain professional ethics, thereby not only strengthening its reputation, but also providing for obligations and actions aimed at preventing conflicts of interest, avoiding corruption and, if these principles are not respected, being held accountable.

2. HansaMatrix hereby (the Policy) **reinforces the principles of corporate ethics**, implemented by the sustainability policy and introduces additional principles aimed at strengthening the work culture that is the responsibility of each and every officer and employee of HansaMatrix and its Group companies (Employees), as each Employee is identified with the Company both during and outside working hours.

"FOR" the professionalism of HansaMatrix employees

3. HansaMatrix expects its employees to treat each other with tolerance and respect, because **every position is important** to HansaMatrix and constitutes the company's experience and knowledge-based approach to the performance of every position, interpersonal communication, and relations with third parties.

4. Employees must critically analyse the information they receive and form their own and, at the same time, the Company's attitude to the events in the Company and the country, **cooperate** and discuss with each other, as well as each employee shall participate and take responsibility for the decisions, actions or inactions taken.

5. The company provides a **working environment** that is appropriate to the professional development of its employees and **safe** for the nature of their work, and implements and maintains the highest industry standards.

6. **The company is attentive to the daily needs of employees in the workplace and requires the same care from employees**, in particular, in delivering a professional result and in making good use of the company's and natural resources.

7. **The company trusts the skills of employees** and encourages them to share knowledge and experience with colleagues, to provide understanding and solutions when mistakes are made without personal antipathy, and to be aware of competencies of their colleagues.

8. The company ensures **equal treatment** without direct or indirect discrimination, including on grounds of nationality, gender, sexual orientation or religion.

9. **The Company respects the freedom of speech, thought and conscience of each employee**, and does not tolerate personal disagreements and disputes between employees, their public discussion and the involvement of other colleagues in aggravating the situation. Any disagreement must be resolved with the involvement of the direct manager and, where appropriate, the Company's Board of Directors.

10. Employees are prohibited from making any unlawful disclosure or using information or authority available to them in the performance of their official duties for purposes unrelated with the performance of their official duties or the performance of specific tasks available to them in the performance of the official duties of their office or assignment.

11. The Policy shall be considered as a document supplementary to the Conditions of Employment and as a directive to Employees as an integral part of the employment relationship.

12. Every employee has a duty of care to **respect the principle of continuity**, which consists in preserving, storing and archiving information created during the employment relationship.



"AGAINST corruption and conflict of interest

13. HansaMatrix accepts commercial hospitality, which is expressed by **equal treatment of all business partners** for the purpose of strengthening cooperation, such as open marketing events, corporate gifts containing Company-identifying information, hosting guests on Company premises, etc. All expenses related to commercial hospitality are accurately reflected in HansaMatrix's accounting records.

14. Accepting any gift carries a significant risk of corruption. **Employees are prohibited from accepting or offering, directly or indirectly, gifts, money and money-like objects, entertainment, benefits**, if they are related to the performance of work duties and if they may affect or cast doubt on the impartiality of the performance of a work duty or task or on HansaMatrix's performance.

15. **Gifts may only be offered and accepted if they have symbolic meaning and value**, and where there are no doubts as to the integrity of the giver or the impartiality of the recipient, e.g. gifts such as flowers, sweets, books, and representational items, business meals up to a value of EUR 70, given on a calendar holiday, or on other occasions such as birthdays and name days.

16. The Employee may, in the performance of his/her duties, have a conflict of interest, i.e. consider entering into transactions involving the Employee's spouse, children, parents, grandparents, brothers, sisters and their children, or with business entities in which the Employee or his/her spouse, children, parents, grandparents, brothers, sisters and their children hold voting or ownership rights to any extent (**Conflict of interest**).

17. In the event of a conflict of interest, the Employee must refrain from entering into a transaction, recommending a transaction or making a decision regarding a third party and must immediately report any potential conflict of interest to the Employee's direct manager or Human Resources Department.

18. Employees shall not engage in side activities or combinations of positions which may interfere with the professional and responsible performance of their duties at HansaMatrix or give rise to the appearance of a perceived or real conflict of interest.

19. **Employees must treat HansaMatrix property and material assets transferred to the employee with care**, as well as the misuse of HansaMatrix resources and activities unrelated to the performance of duties is not allowed.

20. The Company supports charitable donations and/or sponsorships, but only if they are compatible with HansaMatrix's values and business objectives and must not create any obligation on the part of the recipient or oblige the recipient to use HansaMatrix's services or goods. Donations and sponsorships must be open and transparent, based on objective criteria, properly documented and the activities must be agreed in advance in writing with the HansaMatrix Executive Board.

21. HansaMatrix does not financially support political parties or religious organisations.

22. Any employee of the Company who is aware of an offer or request for a gift that does not conform to the type of gift accepted under the Policy, or in the event of suspected corruption or possible conflict of interest, shall inform his/her direct manager or the Board of Directors, who shall decide on further action.

23. The Employee shall report to his/her direct manager immediately, but no later than three (3) days after the relevant circumstances arise. The Employee may also use the HansaMatrix Whistleblower System to report by sending an e-mail to: trauksmescelsana@hansamatrix.com.

24. Further information on how to deal with conflicts of interest, as well as forms for reporting a potential conflict of interest, are available in the HansaMatrix Conflict of Interest Guidelines.

"FOR" fair competition

25. Employees who regularly communicate with competitors, plan business development or pricing strategy, organise price surveys or procurements exposed to the risk of a breach of fair competition.

26. To mitigate the risk of potential breach of fair competition, HansaMatrix stipulates that specific competition-related information may only be obtained in a fair and ethical manner, for example from publicly available sources i.e. press reports, trade journals, annual reports or accounts, public databases, speeches by company officials and from customers in response to competitive offers.

27. Responding to a client's request for a competitive tender means acting independently, evaluating only the specifications provided by the client, without obtaining additional information from the client on competitors' offers.

28. HansaMatrix employees are cautious about the amount of information they provide and receive when participating in joint events with competitors (industry associations, exhibitions, etc.).

29. HansaMatrix employees shall under no circumstances discuss pricing information, sales, production plans and any offers with their competitors, including pricing policies, sales and supplier networks, their terms and conditions and warranties.

30. If an employee is in a situation where a competitor discloses information of such nature, the employee is obliged to immediately stop the conversation on the subject, inform the direct manager and the lawyer. Although the information provided by a competitor may be inadvertent or ill-considered, it may give the impression of artificially inflating prices, which is unlawful.

31. There is no time limit for confidential information available to employees who have performed similar duties for competitors. Employees are recruited only on the basis of their knowledge and skills, and in no case on the basis of information gained in previous employment.

32. In all forms of communication - written, electronic, telephone, face-to-face, etc. - with business partners and other industry representatives, employees

it is prohibited to:

32.1 agree with competitors to fix prices bilaterally or multilaterally, to increase prices uniformly or to take any other action aimed at price coordination

32.2 agree on the division of markets according to any criteria such as territory, buyers, suppliers or other conditions

32.3 communicate in writing with competitors or other business partners for the purpose of coordinating a common course of conduct directed against a third party market participant to affect its competitive position

32.4 agree with competitors not to sell a product to a particular customer or group of customers

32.5 agree on the application of unequal treatment in equivalent transactions, putting someone at a competitive disadvantage

32.6. exchange information with competitors on prices and terms of sale for pending transactions, i.e. those which have not yet been executed or are only planned to be executed

32.7. limit customers' right to buy products separately by offering to buy them only if other products or services are also purchased

32.8. agree to participate/not participate in procurement or tendering procedures or agree on the terms of that action (inaction). Exception to this prohibition: where competitors have made public a joint offer and the offer is not intended to prevent, restrict or distort competition

33.HansaMatrix may participate in professional association meetings provided that discussions are limited to legitimate industry-wide issues (e.g.: marketing standards, regulatory changes, etc.) and that the meetings have **a clear agenda and minutes.** However, as professional associations are by their very nature meetings of competitors, **particular caution should be exercised against engaging in discussions** that may lead to unlawful conduct.

34. Additional attention should be paid to the following aspects of formal decisions of professional associations, which are recorded in the minutes, and informal decisions not recorded in the minutes, as well as to oral recommendations.

35. If a professional association meeting discusses a matter that might be contrary to competition law (for example: illegal exchange of information, concerted action with another market player, etc.), **do the following: object immediately -> ask the chair of the meeting to record in the minutes that you are leaving the meeting and what the reason is -> leave the meeting -> inform your direct manager and HansaMatrix's lawyer about what happened at the meeting.**

"AGAINST" money laundering and the financing of terrorism and proliferation

36. All transactions shall be conducted only in accordance with national and international laws, regulations and agreements, and shall not involve cooperation with persons complicit in money laundering and/or terrorist and proliferation financing activities.

37. It is the responsibility of each employee involved in the transaction process to read and be familiar with the HansaMatrix Counterparty Due Diligence Guidelines and the Counterparty Due Diligence Prerequisites.

38. It is strictly prohibited to engage in any act or omission intended to deceive in order to benefit a third party by means of money laundering and/or tax evasion.

39. The signs of a suspicious transaction include:

- The transaction price differs significantly from the market price of the goods or services;
- the payment is made by a third party or the counterparty requests that the funds be transferred to a third party or to another account in a country where the company is not established or active;
- international transfers from countries where the company is not established and/or has no business activity;
- The counterparty requests payment in cash, including other currencies, the origin of which is not reasonable;
- etc.

"FOR" compliance with international sanctions

40. The terms «trade sanctions» and «embargoes» refer to laws and regulations imposed by States or international organisations in furtherance of foreign affairs, national security or human rights objectives that restrict transactions with specific persons, entities and governments.

41. HansaMatrix complies with the trade sanctions rules of the United Nations, the United States, the European Union and its Member States.

! Additional description of the transaction in the HansaMatrix Counterparty Research Guidelines

"FOR" communication and information confidentiality

42. HansaMatrix handles trade secrets and other business-related information, as well as trade secrets of customers, suppliers and other business partners with due care, ensuring confidentiality and limiting the dissemination of information.

43. Responsibility of each employee to carefully consider the information they provide to third parties about their workplace, documents and information relating to HansaMatrix, its customers or suppliers which, if disclosed, could cause damage to both HansaMatrix and third parties and which is considered to be confidential information.

44. Disclosure of confidential information is not allowed, if the **employee's** job does not involve the receipt/dissemination of such information or such disclosure is **not directed** or instructed by HansaMatrix.

45. Employees must refrain from publicly expressing opinions that are contrary to or incompatible with the employee's position or the objectives of HansaMatrix; however, if a different position is expressed, the personal opinion must be clearly distinguished from the official position of the company.

46. In order **to express** HansaMatrix's **competent** opinion, any communication shall only take place in accordance with HansaMatrix's communication strategy, which provides for a range of persons for communication with third parties and the media. **You should always seek advice from your direct manager and a HansaMatrix communications specialist before starting any communication.**

! Further information on the Company's confidentiality rules is contained in the Internal Rules.



"FOR" personal data protection

47. The processing of personal data shall be permissible if carried out lawfully, fairly and in a manner which is transparent to the data subject, and with appropriate technical and organisational measures in place to ensure adequate protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

48. Employees whose job duties include access to or any handling of personal data (personally identifiable information) must comply with laws and regulations and the HansaMatrix Guidelines on Personal Data Protection, as well as **appropriate confidentiality**.

49. HansaMatrix is diligent in ensuring that the processing of personal data, which includes data and information relating to both Employees and representatives of business partners, and access to personal data is limited to the level necessary for the performance of Employees' direct job duties.

50. It is prohibited to process personal data, including the dissemination and/or collection of data, outside the scope of employment and for a purposes defined by HansaMatrix for which the personal data was collected.

! Obligation of each Employee - immediately notify the Human Resources Department, or by email to: dataprivacy@hansamatrix.com , if he/she becomes aware of a personal data breach, such as, but not limited to, inappropriate storage of data, transmission to the wrong recipient, breach of an employee's competencies, or making a decision regarding the processing and/or storage of Personal Data that does not comply with the Company's Guidelines.



Action in the event of a breach of this Policy

Employees may report violations or threats of violations of the principles contained in the policy **to their direct manager or HansaMatrix lawyer, or use the HansaMatrix Whistleblower System** (Terms and conditions available in Human Resources Department and at: www.hansamatrix.com).

In the event of whistleblowing, **employees are assured full confidentiality and protection.**

Responsibility

Violation of the principles contained in the Policy may result in **disciplinary action** and, in the case of gross misconduct, **termination of employment.**

In the event that an employee violates the principles and/or rules contained in the Policy, **the employee may also be held civilly and criminally liable.**

News of violations may be disseminated throughout the Company so that other employees can learn and make appropriate decisions at other times.



HANSAMATRIX
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Code of Responsible Behaviour

Appendix no. 1 to Ethics and Anti-Corruption Policy
June 14, 2024

Code of Responsible Behaviour

HansaMatrix strives to combine excellent financial results with **responsible and sustainable business practices** respecting the interests of shareholders, employees, business partners, and society.

Understanding that each of our actions and decisions impacts those around us, this *code* sets out the values and principles that every HansaMatrix **employee and manager** commits to respect in their daily activities.

This *code* cannot cover all possible actions, so it should be seen as guideline to **help reduce risks and become more sustainable**.

Anyone facing a choice in interpreting this *code* or witnessing any relevant stakeholders acting against these principles and unsure how to act, is encouraged to seek assistance from the company's board or direct manager.

A possible safe way to verify the application of these guidelines is personal conviction that your actions would stand up to public scrutiny.

It is very likely that you already know much of what is mentioned below; however, this is a **call to action**.

This code consists of **5 essential sections**:

- 1 Be honest and ethical.
- 2 Keep your house in order and apply good governance principles.
- 3 Care about people.
- 4 Encourage collaboration for more advanced society.
- 5 Respect natural environment.

Ethics, honesty and integrity are essential elements in business relationships, therefore every HansaMatrix manager and employee strives to:

- Act in good faith.
- Build trust in all business relationships.
- Keep promises.
- Maintain confidentiality.
- Comply with applicable laws and regulations.
- Uphold the highest standards for professionalism.
- Have zero tolerance for and never engage in any form of bribery and corruption.
- Keep company's business interests above personal interest:
 - ensure ethical handling of personal and professional conflicts of interests;
 - not provide or accept unsuitable gifts and payments that may affect the independence of decision making.
- Avoid to express personal political and/or religious preferences when representing HansaMatrix.

2. Keep your house in order and apply good governance principles

Good governance principles and leadership are essential to the successful operation of the company, therefore HansaMatrix employees strive to:

- Foster transparency.
- Be open-minded and encourage each other to create an open and honest dialogue.
- Compete fairly and make sure competitors do as well.
- Ensure that our activities do not jeopardise the company's reputation and brand.
- Practise responsible communication and service marketing.
- Ensure that the best practices of governance standards are followed.
- Communicate openly about efforts and achievements in being responsible business.
- Ensure that HansaMatrix services are safe and of high quality.
- Managers should be responsible leaders, not just technical managers.
- Require business partners to follow responsible business principles as well.

3. Care about people

People are HansaMatrix's asset, therefore everyone should be treated with respect and care, and should strive to:

- Treat everyone with care, courtesy, respect, and honesty.
- Not to discriminate, meaning to treat everyone with respect regardless of gender, age, race, ethnicity, religion, sexual orientation, disability, or other characteristics.
- Support motivation and ensure well-being of employees.
- Provide a safe and healthy workplace for all employees.
- Facilitate development and professional growth of each individual.
- Share knowledge and experience with colleagues and business partners.

4. Encourage collaboration for more advanced society

Increasing the connection and interaction between business and society is crucial for long-term success, therefore HansaMatrix employees strive within their competences to:

- Consider wider societal impact of every business decision.
- Promote dialogue and collaboration with colleagues in electronics industry and local business community.
- Organize activities in a manner that considers the interests of the communities around us.
- Allocate resources and support initiatives that promote a more sustainable society.

5. Respect natural environment

HansaMatrix respects the limitations of this planet's resources and takes environmental responsibility seriously, therefore strives to:

- Consider environmental impact of all our actions and decisions.
- Aim beyond the minimum requirements of environmental regulations and standards.
- Adopt new technological solutions to improve our efficiency and reduce the use of resources, waste and emissions.
- Support innovations that result in smarter use of natural resources in our operations, as well as for partners and customers.

