Semperit Group Supplier Policy

This Policy outlines Semperit Group's core values, principles, and standards for its Suppliers. Semperit's Suppliers (hereinafter the "Suppliers") are expected to adhere to, accept, and adopt globally recognized applicable principles and standards when producing and delivering goods and services. Semperit encourages Suppliers to communicate these values, principles and standards throughout their value chain and expects Suppliers and their Suppliers to observe all applicable laws and regulations. For supplies to Semperit's European entities or from Suppliers having their seat in Europe in addition Annex 1 of this Policy applies.

Principles and Objectives

Our principles ensure that our Suppliers are collaborating with us to pursue the highest business ethics and sustainability standards, including social and environmental responsibility in our supply chain. This Policy focuses in particular on the following topics:

1. **Human rights and labor standards**
2. **HSE (Health, Safety, and Environment)**
3. **Business integrity and ethics**
4. **Business and operational excellence**

We expect Suppliers to undertake steady and sustainable efforts to improve cost efficiency and performance across the supply chain. We support the UN Global Compact's principles and encourage our Suppliers to align with the same principles. Furthermore, we ask our Suppliers to protect the environment and climate and respect and uphold human rights as well as applicable social standards. For more information on the principles that underlie Semperit´s business and actions, please refer to our Code of Conduct[1].

Human Rights and Labor Standards

Suppliers are obliged to respect and comply with applicable local labor laws and International Labor Organization (ILO) standards[2], internationally recognized labor and human rights standards and others[3].

Suppliers are obliged to treat employees[4] fairly, with dignity and respect, and consider the rights and interests of affected communities and their stakeholders according to the ILO and applicable laws and standards:

a. Suppliers shall pursue strict "no child labor", "no forced or compulsory labor," and "no human trafficking" policies. They must ensure that no form of bonded labor is used, and that employment is based on free will.
b. Suppliers shall comply with applicable social and minimum standards, such as healthy and safe working environments, fair wages, and fair working hours.
c. Suppliers shall not tolerate any form of discrimination or abuse. Equal opportunity and respect shall apply to everybody regardless of age, gender, race, color, nationality, ethnic or social origin, genetic features, language, disability, sexual orientation, religion or beliefs, political or any other opinion, membership of a national minority, property, birth, disability and others.
d. Suppliers shall recognize, as far as legally allowed, the right of free association of employees and shall neither favor nor discriminate against members of employee organizations or trade unions.

Health, Safety, and Environment (HSE) Standards

Semperit demands its Suppliers to be proactive and responsible in HSE issues and to comply with applicable local and international laws and regulations. Suppliers should strive to prevent any negative impacts on HSE and shall strive to minimize actual or potential adverse effects on safety, health, the environment, and natural resources in their operations.

a. Suppliers agree to proactively review, identify, assess, and appropriately address HSE issues, risks, and impacts in their current and future operations.

[1] www.semperitgroup.com/fileadmin/user_upload/MediaLibrary/SemperitGroup/Company/Compliance/Code_of_Conduct_V7_May2024/2024-05-14_CoC_V7_2024_EN.pdf .
[2] libguides.ilo.org/international-labour-standards-en/resources .
[3] OECD Due Diligence Guidelines, UN Guiding Principles on Human Rights, Fundamental Principles of the ILO and International Bill of Human Rights, UK Modern Slavery Act
[4] The term "employee" in this Policy applies to all types of employees and contracted labor, regardless of the nature, form and wording of the underlying employment contract.

b. Suppliers shall incorporate all relevant state-of-the-art HSE features in their product design, process development, projects, and services.
c. Suppliers agree to manage transport efficiently to reduce risk, cost, and environmental impact.
d. Suppliers shall prioritize renewable energy, increase energy efficiency, reduce CO2 emissions, and strive for efficient water use and waste volume/generation.
e. Suppliers shall offer sustainable raw materials, such as recycled, reused, or biologically sourced materials, or those with a lower Product Carbon Footprint (PCF), where practically possible and economically feasible.
f. Semperit encourages its Suppliers to define ambitious health and safety goals or adopt standards emphasizing that no task is important enough to risk anyone's health and safety.

Business Ethics

A sustainable and successful business relationship requires integrity, transparent business practice standards and compliance with all applicable laws and regulations.

a. Suppliers shall operate honestly and equitably throughout their supply chain, complying with local and applicable international laws and regulations, including but not limited to public and tax law, insider trading, anti-corruption, anti-trust, anti-money-laundering, intellectual property protection, data protection, data privacy and cyber security at both corporate and personal levels.
b. Suppliers shall maintain uncompromising integrity in all business activities. We expect a "zero-tolerance" policy on bribery, fraud, corruption, and other illegal / frowned-upon practices from all our Suppliers and their Suppliers. Suppliers shall comply with local and international anti-corruption and anti-bribery laws and regulations.
c. Suppliers commit to responsible sourcing by:
   - compliance with provisions of this Policy;
   - preferring certified Suppliers and recycled products where practically possible and economically feasible;
   - no conscious or negligent use of conflict resources or illegally exploited resources;
   - observance of Regulation (EU) 2017/821the OECD due diligence guidance for responsible supply chains of minerals from conflict-affected and high-risk areas and Section 1502 of the Dodd-Frank- Act[5] on requiring responsible minerals sourcing.
d. Suppliers shall comply with all applicable international trade laws and regulations, including import and export regulations, applicable embargoes, sanctions, and anti-boycott laws.
e. Suppliers commit to data protection, privacy, and cyber security and shall ensure proper technical and organizational measures to protect integrity, confidentiality and availability of data and privacy.

Business and Operational Excellence

a. Commercial and Technical performance: Suppliers engage in improving performance continuously.
b. Quality: Suppliers agree to follow international quality management standards.
c. Service: Suppliers agree to foster a culture of service excellence. This involves meeting or exceeding customer expectations, anticipating needs, ensuring compliance with all applicable laws and regulations throughout our shared supply chain, and providing expertise as needed.
d. Innovation: Our ability to innovate is a strategic sustainability feature in our supply chain and a significant competitive advantage in our supplier partnerships. We expect our Suppliers to continuously rethink their business models, products, technologies, and processes in collaboration with Semperit.

Transparency in Supply Chain

a. Suppliers are committed to creating and maintaining a safe work environment. The following means might be used to prove compliance:
   - In case of an internal audit or an audit performed by a third party, the Supplier will communicate the audit report (only the part related to the provisions of this Policy) to Semperit.
   - Semperit will decide if, when, where, and how a supplier audit will be conducted in accordance with the provisions of Semperit. Semperit will announce such audits in advance.
   - EcoVadis assessment or other self-assessment questionnaires.
b. Suppliers must have adequate processes to ensure traceability and prohibit and ban the conscious or negligent use of conflict materials and illegally exploited resources for any (raw-)materials delivered to them.

[5] https://www.sec.gov/files/rules/final/2012/34-67716.pdf

c. Suppliers must have adequate processes to follow and document their supply chain when practically possible and economically feasible and when requested by Semperit.
d. Suppliers shall obtain Semperit's prior permission before engaging any subcontractors/Suppliers' subcontractors relevant to the contractual relationship and shall ensure that they also adhere to the values and standards outlined in this Policy.

Implementation and Monitoring

Suppliers are responsible and accountable for implementing and maintaining the standards and principles outlined in this Policy. Suppliers shall communicate them to their employees and Suppliers throughout their value chain and inform them about their respective rights and responsibilities. Semperit reserves the right to verify the proper implementation of these standards and, in case of any violations, to take appropriate action, including the termination of business. Suppliers must inform Semperit immediately of any breach of applicable laws or provisions of this Policy.

a. We expect our Suppliers to have appropriate up-to-date management, monitoring and evaluation systems or to introduce these promptly to ensure compliance with applicable laws, regulations and requirements of this Policy.
b. Suppliers agree to adopt appropriate principles corresponding to those outlined herein for their respective Suppliers.
c. Suppliers actively address and mitigate any supply chain risks.
d. Semperit will verify compliance with standards outlined in this Policy through personal meetings, self-assessment questionnaires, external business checks, company visits, and audits.
e. In case of non-compliance, Semperit will work with Suppliers to ensure they implement improvement plans and take corrective actions.

Semperit works closely with its Suppliers to create a successful partnership based on mutual trust and open communication, working towards the highest sustainability standards along the supply chain.

Amendments

Semperit reserves the right to review and change this Policy accordingly. Any reference to laws and regulations refers to their latest version.

Reporting of concerns:
Suppliers can report known or suspected violations of this Supplier Policy at any time to: compliance@semperitgroup.com or through the Semperit Speak Up hotline, SemperLine: www.bkms-system.com/bkwebanon/report/clientInfo?cin=19semp16&c=-1&language=eng .

BY ACCEPTING THIS POLICY, THE SUPPLIER ACCEPTS ITS GUIDANCE AND STANDARDS INCLUDING THE VALUES AND PRINCIPLES OF SEMPERIT´S CODE OF CONDUCT AND IS OBLIGED TO COMPLY WITH THEM DURING THE CONTRACTUAL RELATIONSHIP WITH SEMPERIT. ANY VIOLATION OF THIS POLICY WILL THUS BE DEEMED AS A SEVERE BREACH OF CONTRACT WHICH ENTITLES SEMPERIT TO WITHDRAW FROM THE CONTRACT UNLESS THE SUPPLIER MANAGES, AFTER BEING GRANTED A REASONABLE PERIOD OF GRACE, TO ELIMINATE / RESOLVE THE CIRCUMSTANCES / ISSUES WHICH LED TO NON-COMPLIANCE WITHIN SUCH PERIOD. HOWEVER, IN CASE OF DELIBERATE OR REPEATED NON-COMPLIANCE OR IN CASE SEMPERIT'S BUSINESS AND / OR REPUTATION MIGHT BE AFFECTED BY THE NON-COMPLIANCE OF THE SUPPLIER, SEMPERIT IS ENTITLED TO WITHDRAW FROM THE CONTRACT WITH IMMEDIATE EFFECT (I.E. WITHOUT NECESSITY TO ALLOW FOR A PERIOD OF GRACE BEFORE WITHDRAWAL).

The Executive Board

Semperit AG Holding

Manfred Stanek

Helmut Sorger

Gerfried Eder

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SEMPERIT

Semperit Group Supplier Policy - Annex: Cyber Security and Data Protection

Suppliers shall ensure full compliance with all applicable cyber security, data protection and privacy legislation, regulations, and international standards. Suppliers must implement technical and organizational measures to protect integrity, confidentiality, and availability of all information and data obtained directly or indirectly from or for Semperit during the business relationship. This includes, but is not limited to, regular security and data protection assessments, employee trainings, and incident (cyber security, data breaches, or any other cyber threats) response protocols.
Suppliers shall prevent unauthorized access or disclosure, manipulation and loss of our data and systems, in particular:

- Confidentiality: Only authorized persons have access to (non-confidential and confidential) data and information of Semperit.
- Integrity: Data must be accurate and complete, and any data and systems must be protected against manipulation.
- Availability: Information and systems must always be accessible to authorized persons.

We expect our Suppliers to have their information security systems certified, or to be subject to applicable regulatory requirements in the area of information security (e.g. ISO27001, NIST-800[6], TISAX[7], NIS II[8]/ DORA[9] / PCI[10]) or have committed themselves to an internal set of rules based on such international standards. In any case, Suppliers must comply with the following technical and organizational security standards to ensure the security and availability of information systems:

- Network security: Protection of all systems through state-of-the-art firewall technologies, virus protection and secure network configurations.
- Patch management: Regular updating and patching of all systems used to close known security gaps.
- Encryption of confidential information and data in transit and at rest in accordance with recognized industry standards.
- Access controls: Implementation of access and authentication mechanisms to ensure only authorized persons have access to Semperit data and audit trails.
- Adequate safeguards: Suppliers must ensure adequate safeguards are in place for cross-border transfers of Semperit data including personal data of Semperit employees (e.g. SCCs, legal assessments, or approved certifications) and comply with data localization laws where applicable.

Furthermore, Suppliers are obliged

- to report security incidents, security threats or any kind of data breaches affecting Semperit immediately (within 24 hours at the latest) and take appropriate measures to contain and eliminate those,
- to analyze and document the incident, the threat or the data breach, and subsequently implement measures for future prevention,
- to cooperate with Semperit and any relevant regulatory authorities in the event of investigations, audits, or data breach notifications as required by law.

When processing personal data of Semperit or Semperit's employees, Suppliers shall:

- ensure that any processing of personal data is conducted on a lawful base, in accordance with applicable data protection laws. The data shall only be processed for legitimate and clearly defined purposes.
- ensure that any third parties or sub-processors engaged in processing personal data of Semperit employees are contractually bound to meet the applicable data protection requirements.
- cooperate with Semperit in responding to data subjects' requests and ensure these rights are respected in accordance with applicable law.

We expect Suppliers to securely return all data obtained directly or indirectly from or for Semperit during the business relationship upon termination. The data shall be provided in a commonly accepted machine-readable format, such as CSV, XML, or any other mutually agreed-upon format. Suppliers shall ensure that the data is complete, accurate, and in a usable condition. Suppliers may retain such data only for as long as it is necessary to fulfil its contractual obligations or as required by applicable laws and regulations. Such data shall be securely deleted upon fulfillment of these obligations or expiration of the required retention period (except for copies of data that are securely stored in archival and back-up-systems).

[6] nist.gov/itl/publications-0/nist-special-publication-800-series-general-information .
[7] Trusted Information Security Assessment Exchange.
[8] eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32022L2555 .
[9] eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32022R2554 .
[10] Payment Card Industry Data Security Standard.