

SUSS Code of Conduct

Growing Innovation



Contents

Foreword from company management	3	1. Equal treatment and protection	8
Objective	4	a. Mutual respect and equal treatment	9
What we expect from our workforce	4	b. Fair working conditions, safety and health	10
What we expect from our management staff	4	c. Responsibility within the supply chain	11
What we expect from business partners	5	2. Respect and integrity	12
Compliance	5	a. Anti-corruption	13
Violations of our code	6	b. Gifts and invitations	15
Reporting violations	6	c. Dealing with third parties	16
Protection against retaliation	6	d. Competition and antitrust law	17
		e. Economic sanctions and prevention of money laundering	18
Basic behavioural requirements	7	f. Foreign trade law	18
		3. Transparency and reliability	19
		a. Dealing with company property and expertise	20
		b. Orderly accounting processes	21
		c. Data protection	22
		d. Public reporting and communications	23
		e. Handling insider information	23
		f. Avoiding conflicts of interest	24
		4. Responsibility for the environment and society	25
		a. Protection of the environment and climate	26
		b. Product safety	27
		c. Donations and sponsoring	27
		d. Social commitment	27

Foreword from company management



Dear colleagues,

The reputation of SUSS in the business world is one of our most valuable assets. It is largely influenced by our conduct in business. It is therefore a matter of course that as an internationally active company we keep ourselves informed of and comply with the legal and cultural frameworks of all the countries in which we operate.

Our Code of Conduct describes the values we share within the company and how we want to work with each other and with business partners. We attach particular importance to values such as transparency, honesty and integrity, as well as the personal responsibility of each and every one of us. This Code of Conduct was adopted as part of the Group-wide compliance programme in order to address legal and ethical challenges in daily work, to provide orientation, and thus to further strengthen trust in the performance and integrity of SUSS.

This Code of Conduct contains minimum standards that are binding for all employees of SUSS and its subsidiaries worldwide.

Transparency > Honesty > Integrity

We expect our entire workforce, especially our managers, to live up to their role model function and to uphold and communicate the principles of our company.

Last but not least, the rules of this Code of Conduct serve to protect our employees and at the same time help them to act in accordance with the law and our ethical principles in new or critical situations. If anything is unclear, please do not hesitate to ask your manager or seek advice and support from another point of contact, such as the Compliance Officer, the Legal or HR department, or directly from the Management Board or Board of Directors.

In many cases, violations of the law can be avoided by providing timely advice. It therefore applies to all of us to seek advice and help from one of the contact points just mentioned in case of legal doubts or indications of legally dubious processes in our working environment.

With seven decades of experience, we are proud of what we do as one of the world's leading manufacturers of equipment and process solutions for the semiconductor industry. By consistently following our Code of Conduct, we can also all be proud of how we do it.


Burkhardt Frick
CEO


Dr. Cornelia Ballwießer
CFO


Dr. Thomas Rohe
COO



Objective

Our Code of Conduct (our “Code”) is designed to provide better guidance and help us all make business decisions day in, day out, in compliance with the highest ethical and legal standards.

Our Code cannot anticipate every day-to-day business situation that we may encounter in the future. However, it will help us to make sound ethical decisions. Our Code serves as a guide and refers to SUSS guidelines and to applicable laws and regulations, which we must all observe in order to act in accordance with our core values and fundamental expectations.



What we expect from our workforce

This Code of Conduct has been adopted as part of the company-wide Compliance Management System. It supplements the existing compliance rules as well as all procedure rules and the rules of procedure applicable to the members of the Executive Board.

Compliance with this Code is binding for all managers and all employees of SUSS worldwide. In the event of any conflict between the provisions of this Code and any these provisions or guidelines of a subsidiary, the stricter regulation shall apply in each case. If two different jurisdictions are applicable at the same time and conflict with each other in their legal consequences, we apply the stricter jurisdiction in each case.

What we expect from our management staff

Our managers take on a special responsibility in accordance with our Code.

- They act as role models and actively promote compliance and ethical behavior – in other words, by acting in a manner that demonstrates what it means to act with integrity.
- They ensure that our workforce understands and complies with the requirements of our Code.
- They monitor compliance with the Code among the employees they lead.
- They support employees who raise questions or concerns in good faith.
- They create an awareness in their teams of the notion that results only count when they have been achieved in the right way.

What we expect from business partners

We expect our business partners to accept the principles of this Code and to follow them in their cooperation with us – or to submit a comparable Code of Conduct for their company.



Compliance

SUSS expects the entire workforce to comply with laws and regulations at all times. This is a fundamental principle for a responsible company. And it is also an essential part of our sustainable corporate governance programme.

Only ethically correct conduct of all our employees ensures the long-term success of our company. In deciding whether a specific action – or the opposite: an omission – might constitute a breach of our Code, you should ask yourself

- Could this conduct be perceived as dishonest, unethical or illegal?
- Could this behaviour lead to SUSS losing credibility with our customers, business partners, shareholders or society?
- Could this behaviour cause specific harm to other people?
- Can I only talk about this behavior with difficulty in the closest private environment, for example in the family circle?
- Can the daily press report this behaviour on the front page only in a way that inevitably triggers critical follow-up questions from press representatives, authorities or the public?
- Can this behaviour also attract attention on social media platforms and might it provoke a subsequent wave of media indignation on the Internet?

If the answer to even one of these questions is “yes” or “maybe”, you have identified a potential problem. Inform your manager, our Compliance Officer or report the matter confidentially and/or anonymously via our whistleblowing hotline. Your manager or our Compliance Officer will also be happy to provide you with information on compliance-appropriate conduct in case of doubt.

Violations of our code

We must all abide by our Code. Violations of our Code, our internal policies or the law can have serious consequences, including disciplinary action up to and including termination of employment, as well as possible civil or criminal action.



Reporting violations

At SUSS, we promote an open corporate culture. We encourage all employees to report concerns or critical behaviour to the manager or the Compliance Officer (speak-up culture). You can also use our confidential whistleblowing hotline (by telephone or e-mail) or our anonymous whistleblowing website. Our Compliance Officer is available there as a contact person. The reports will be treated confidentially for as long as the legal framework allows. In addition, employees also have the option of contacting the works council, the legal or human resources department and the Executive Board directly.

We take these reports seriously and investigate any misconduct thoroughly. Should an internal investigation become necessary, we rely on the support and open cooperation of the workforce. Any retaliation against whistleblowers following a report made in good faith will not be tolerated and will be investigated and prosecuted as a stand-alone violation.

Contact

Tonia Laich
Compliance Officer
Phone +49 89 32007-244
E-mail tonia.laich@suss.com
Whistleblowing Hotline (for confidential reports)
Phone +49 89 32007-599
E-mail compliance@suss.com
Whistleblowing website (for anonymous reports)
<https://suss.grc-cloud.de/meldung>

Protection against retaliation

At SUSS, we do not tolerate any retaliation against whistleblowers who have expressed doubts or concerns in good faith. This protection acts, for example, to counter personal reprimands, harassment, reprisals or other undue negative effects on the professional career. Reports may be made in one's own name or confidentially. Telephone calls, face-to-face conversations and written reports are all kept strictly confidential. Employees who violate these principles must expect disciplinary measures that may include termination of employment. This also applies to reports made for defamatory or indecent reasons.



Basic behavioural requirements

Business ethics and integrity ensure our credibility. It goes without saying that all our Group companies and their employees comply with the laws and regulations of the states in which they operate and fulfil their obligations in a reliable manner. They must act in all aspects of their business according to principles of sincerity and fairness.

We are convinced that ethical and economic values are interdependent and that the business world should treat each other fairly and act within the given norms.

Our principles

- 1. We respect the dignity of every individual and are committed to diversity in the company.
- 2. Our conduct in business relationships and partnerships is based on mutual respect and integrity.
- 3. We act transparently and reliably towards our shareholders.
- 4. We are aware of our responsibility to the environment and society.

What does this mean for me?

Question

You have considered calling our Compliance Officer, but you are not sure whether you should. During a negotiation with the clientele, your manager asked you in private to record the date of the order in a special way and to put the date of the order in the previous quarter in the negotiation protocol. You have your doubts, but you also wish to avoid a possible negative reaction from your manager if you do not proceed as requested. What should you do?

Answer

Our Code states that you must speak up if you are in doubt about the correctness of any action. In principle, your manager is the best person with whom to raise concerns directly. However, as this is a request from your manager, your consideration of confidentially contacting the Compliance Officer is the better option. If you make a statement in good faith, we will carefully review that statement and will not allow anyone to retaliate against you. Do the right thing – speak up!



1

Equal treatment and protection

We respect the
dignity of every
individual and
are committed
to diversity in
the company





1. Equal treatment and protection

Our daily cooperation at SUSS is based on fair and respectful interaction with each other. We trust and support each other, both within our core teams and beyond across the business. The same applies to dealing with our customers and business partners.

a. Mutual respect and equal treatment

SUSS accepts internationally recognized human rights and supports their observance. We respect each person's personal dignity, privacy and personal rights. We measure our actions against the United Nations Charter of Human Rights (UN) and the core labour standards of the International Labour Organizations (ILO).¹

We also promote equal opportunities and prevent discrimination when hiring or promoting employees. Part of our corporate strategy is to work with individuals of different ethnic origins, culture, religion, different ages, regardless of political, social or trade union activity, disability, skin colour, sexual orientation, identity and expression, belief and gender. We create a culture of tolerance that consciously promotes diversity and inclusion in the company so that all employees feel at ease with us and can develop their full potential.

Based on these characteristics, we do not tolerate discrimination, harassment on social networks, or of a verbal, physical or sexual nature, bullying or other personal attacks on individuals. Where provisions or guidelines with the subsidiaries exist, such as Employee Manuals, these apply accordingly.

We guarantee and respect the right of our employees to freedom of association and the formation of employee representation with respect to management in accordance with the applicable national laws.

What does this mean for me?

Question

You are looking for a new technical assistant. You are wondering whether you can only consider persons of the same gender, because in principle you believe that you can work better with persons of the same gender.

Answer

You are looking for a new technical assistant. You are wondering whether you can only consider persons of the same gender, because in principle you believe that you can work better with persons of the same gender.

¹ You can find explanations and information on the United Nations website as well as on the International Labour Organisation website. If you have any questions, please contact our Chief Compliance Officer.
<https://europe.ohchr.org/EN/pages/home.aspx>
<https://www.ilo.org>

b. Fair working conditions, safety and health

We offer our employees reasonable pay and fair working conditions that comply with statutory requirements, for example with regard to working hours. We generally pay more than the legally guaranteed minimum wages in the respective labour markets.

The health and safety of our employees at their workplace is our top priority. We create a safe and healthy working environment for our entire workforce to protect them from physical and mental harm.

SUSS ensures that the work environment complies with current technical and operational safety standards. At the same time, we also depend on the involvement of our workforce. We trust that our employees will report all safety and health risks and comply with existing safety rules themselves.

What does this mean for me?

Strict adherence to our safety regulations and practices in day-to-day work is an indispensable prerequisite. Responsibility towards employees requires the best possible precaution against accident risks and applies to:

- Technical planning of workstations, facilities and processes
- Security management
- Personal behaviour in everyday work





c. Responsibility within the supply chain

We recognise universally applicable human rights based on the UN Human Rights Charter and assume responsibility within our company and in our supply chain by also fulfilling our human rights due diligence obligations with our direct supplier companies. When selecting them and while working with them, we take care to ensure that no human rights are violated or manifestations of modern slavery such as child labour, human trafficking or forced prostitution are permitted outside our company. We expressly expect our immediate suppliers (Tier-1) to exercise their own due diligence obligations on their next level of suppliers (Tier-2).

What does this mean for me?

Question

During a delivery company audit, you see several workers with your own eyes on the premises of the delivery company – some of them recognisably in their early teens, obviously loading very heavy boxes onto the loading ramp of trucks.

The workers have great difficulty lifting the loads without mechanical means like a forklift truck, nor do they wear helmets or protective clothing. You feel for the minors, but you also think to yourself that it is your supplier's job to prevent underage labour.

Should you make your perception an issue and personally address the delivery company about it, report it internally or just keep quiet?

Answer

Although we cannot take full responsibility for situations outside our company or our control, we all need to remain vigilant at all times and everywhere. Recently, cases of modern slavery have increased due to the employment of migrant workers in jobs requiring little or no qualifications. In the present situation, what you saw could be a case of forced and underage labour, which in turn raises concerns about the ethical and professional conduct of the company. Compliance in general and common action against modern slavery is an indispensable criterion in the assessment of our business partners. Be sure to raise this issue with your manager.

2

Respect and integrity

**Our cooperation
with business
partners is based
on mutual respect
and integrity**





2. Respect and integrity

The principles of mutual respect and equal treatment also apply to dealings with our customers, business partners, government agencies, international or supranational organisations and non-governmental organisations (NGOs) such as Amnesty International (AI) and Transparency International (TI). Compliance with laws and regulations is paramount to us, as we do not do business at any price.

a. Mutual respect and equal treatment

SUSS earns its orders fairly, through customer orientation, innovations and technologically leading products. We tend to forego doing business than to violate laws and internal regulations. Similarly, we do not allow ourselves to be unduly influenced, but make business decisions based solely on objective criteria.

Our employees are not permitted to directly or indirectly offer, promise, grant or accept unjustified advantages in connection with their work for SUSS. In order to prevent possible damage to SUSS, we avoid even the mere appearance of undue influence.

We always act in accordance with national and international laws. According to these, the following must be regularly observed:

“Bribery” is the offering, giving, accepting or soliciting of payment or

anything of value for oneself or a third party in order to enter into a new contract, obtain or retain official authorisation or any other improper advantage. Bribery in business transactions and bribery of public officials are prohibited as forms of active corruption in every country. Bribery of foreign public officials can also trigger international criminal prosecution, for example, based on US or UK laws with extraterritorial application, i.e. with effect beyond the respective national borders.

“Facilitation Payments” as a form of active bribery are payments of a generally smaller amount of money in cash to foreign officials whose purpose is to cause them to accelerate or even carry out a fundamentally lawful official act to which a claim is made, such as issuing licences, visas or permits.

“Kickbacks”, as a manifestation of passive corruption or bribery, are typically payments that a representative of a company receives from its business partners for the successful conclusion of a contract.

What does this mean for me? (Example 1)

Question

Upon arrival at the airport, an immigration official kindly offers to treat you preferentially in an expedited procedure. Skipping the long queue will cost you only \$50 in cash. Since you have already started your business trip far too late due to the delayed flight anyway, you are considering accepting this offer.

Answer

Even if accepting the offer means arriving on time at an important business appointment, you may not comply with such a request for payment. This could be considered a criminal bribe under international law – even if only a small amount of cash is involved. Indeed, international companies and their employees around the world have been persecuted in similar cases due to active corruption.

What does this mean for me? (Example 2)

Question

Urgently needed machine parts have been stuck in a country's customs clearance for a long time. The responsible customs personnel have personally informed you verbally that a further delay can only be avoided by an immediate cash payment of a few hundred US dollars to a certain person. How do you proceed?

Answer

You must not accept this "offer" under any circumstances and must accept the delay in customs clearance as a final consequence – even if there is a threat of contractual penalties due to delayed delivery. Make it clear to customs staff that the proposed course of action is in breach of international law and that you will not agree to an improper facilitation payment. Furthermore, you should contact your manager with the name of the customs personnel and promptly inform our Compliance Officer about this process.

An exception to this may only apply if the requested payment complies with an official fee schedule and is made against delivery of a proper receipt or if the request for facilitation payment is made under threat of coercive measures or a serious threat that could pose a risk to your well-being.



b. Gifts and invitations

Employees may not use their professional position at SUSS to obtain or demand improper advantages for themselves or a third party.

When dealing with business partners, customers or delivery companies, it is prohibited to grant, promise, demand or accept gratuities of any kind.

Exceptions to this are socially appropriate gratuities, which are approved in accordance with general as well as internal company principles, taking into account specific social and regional features. The company's internal principles on social adequacy can be found in our company's internal guidelines on gifts and invitations. We expect all employees to inform their managers if they receive such offers from business partners.

What does this mean for me? (Example 1)

<p>Question</p> <p>A sales employee from a SUSS delivery company offers us chocolate and some of the company's wall calendars as Christmas gifts. Can I accept these gifts and share them with my colleagues?</p>	<p>Answer</p> <p>Yes, you can – provided that these gifts are within the limits of social appropriateness and are not luxury items. Corporate printed promotional gifts are usually reasonable gifts that do not usually increase the risk of passive corruption.</p>	<p>Question</p> <p>You are stuck in a crucial negotiation phase dealing with procurement negotiations. During a short break, you are offered tickets to a top-class football match that you absolutely want to see. Is it proper to accept the ticket?</p>	<p>Answer</p> <p>No. Employees are not allowed to accept gifts or invitations while engaged in business negotiations and tender procedures. Outside of such critical decision-making phases, you should consider the social adequacy of the invitation and its potential impact on the public. This type of invitation would also probably exceed the limit of what we deem appropriate for invitations.</p>
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What does this mean for me? (Example 2)

<p>Question</p> <p>An important customer is giving a dinner party to celebrate the company's anniversary. Representatives from other companies will be present. May I accept this invitation?</p>	<p>Answer</p> <p>Yes, provided that you make it clear that you accept the invitation on behalf of SUSS. Inform your manager or Compliance Officer beforehand.</p>	<p>Question</p> <p>A direct supplier has invited you and your partner to a golf weekend at a five-star resort. Accommodation and travel expenses will be paid to express thanks for a long-standing business relationship. Can you accept this offer?</p>	<p>Answer</p> <p>No. The total economic value of this trip would certainly exceed the criteria of social appropriateness and must therefore be declined. Accepting the invitation could jeopardize your independence and future interactions with this supplier, as well as the reputation of our company. Last but not least, such behaviour can also be seen as passive corruption.</p>
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What does this mean for me? (Example 3)

<p>Question</p> <p>You are stuck in a crucial negotiation phase dealing with procurement negotiations. During a short break, you are offered tickets to a top-class football match that you absolutely want to see. Is it proper to accept the ticket?</p>	<p>Answer</p> <p>No. Employees are not allowed to accept gifts or invitations while engaged in business negotiations and tender procedures. Outside of such critical decision-making phases, you should consider the social adequacy of the invitation and its potential impact on the public. This type of invitation would also probably exceed the limit of what we deem appropriate for invitations.</p>
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What does this mean for me? (Example 4)

<p>Question</p> <p>A direct supplier has invited you and your partner to a golf weekend at a five-star resort. Accommodation and travel expenses will be paid to express thanks for a long-standing business relationship. Can you accept this offer?</p>	<p>Answer</p> <p>No. The total economic value of this trip would certainly exceed the criteria of social appropriateness and must therefore be declined. Accepting the invitation could jeopardize your independence and future interactions with this supplier, as well as the reputation of our company. Last but not least, such behaviour can also be seen as passive corruption.</p>
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c. Dealing with third parties

Our relationships with customers and business partners are based on integrity, quality, reliability and competitive prices. Decision-making and selection processes may therefore only be based on factual considerations.

What does this mean for me?

Question

An independent sales agent approaches you and claims to have very good contacts in his country with local decision-makers, all the relevant authorities and companies in the semiconductor industry. This person offers you his services for a fixed fee and performance-related additional payments for the delivery contracts it brokers. Do you see a risk for SUSS?

Answer

Under international anti-bribery laws, contracting companies can be held liable if business partners commit an act of bribery – such as to obtain a required licence or permit or a new contract – on their behalf. Therefore, all companies with which SUSS has a business relationship must be carefully selected and monitored on a risk basis. Providing services in a corruption-prone region, a close connection to local decision-makers and government agencies, as well as performance-based remuneration, all point to an increased risk. As a result, we reserve the right to reject high-risk business relationships. Speak to the Compliance Officer well in advance.





d. Competition and antitrust law

The name SUSS stands for innovation, technological leadership, transparency, fairness and customer orientation. It is therefore in line with our business policy to promote fair competition. We comply with competition laws, as violations not only jeopardize our reputation, but can threaten the entire business. We do not obtain contracts by means of cartel agreements or illegal financial contributions.

- Agreements and concerted practices between competing companies (so-called horizontal competition agreements) which have the purpose or effect of preventing or restricting competition are strictly prohibited! These include, for example, agreements on prices, quotations, customer allocations, terms of sale, production or sales quotas or the division of geographical markets.
- Vertical restraints of competition, i.e. agreements between suppliers and customers or patent holders and licensees, are also prohibited. These include restrictions on customers' freedom to set prices or supply relationships with business partners (geographical, human or material restrictions), certain most-favoured-nation clauses, exclusivity obligations such as exclusive supply and non-compete clauses.
- Abuse of a dominant position is prohibited. Such abuse may occur, for example, in the case of different treatment of customers without objective justification, refusal to supply, selective distribution, enforcement of unreasonable purchase/sales prices and conditions or tying effect clauses added without objective justification for an additional service.

In cases of doubt in the field of competition law, it is advisable to contact the Legal Department at an early stage. Please also observe our guidelines on dealing with and contacting competitors.

What does this mean for me?

In contacts with competitor companies, care must always be taken to ensure that no information is received or given that would allow conclusions to be drawn about the current or future market behaviour of the party providing the information.

e. Economic sanctions and prevention of money laundering

As a globally active company, we observe national and international economic sanctions and comply with all laws relating to the prevention of money laundering and terrorist financing.

f. Foreign trade law

We observe all legal foreign trade regulations. These must generally be observed when exporting goods, intangible goods and services.

As a rule of thumb, restrictions may apply to military goods and civilian products that can also be used for military purposes (dual use).

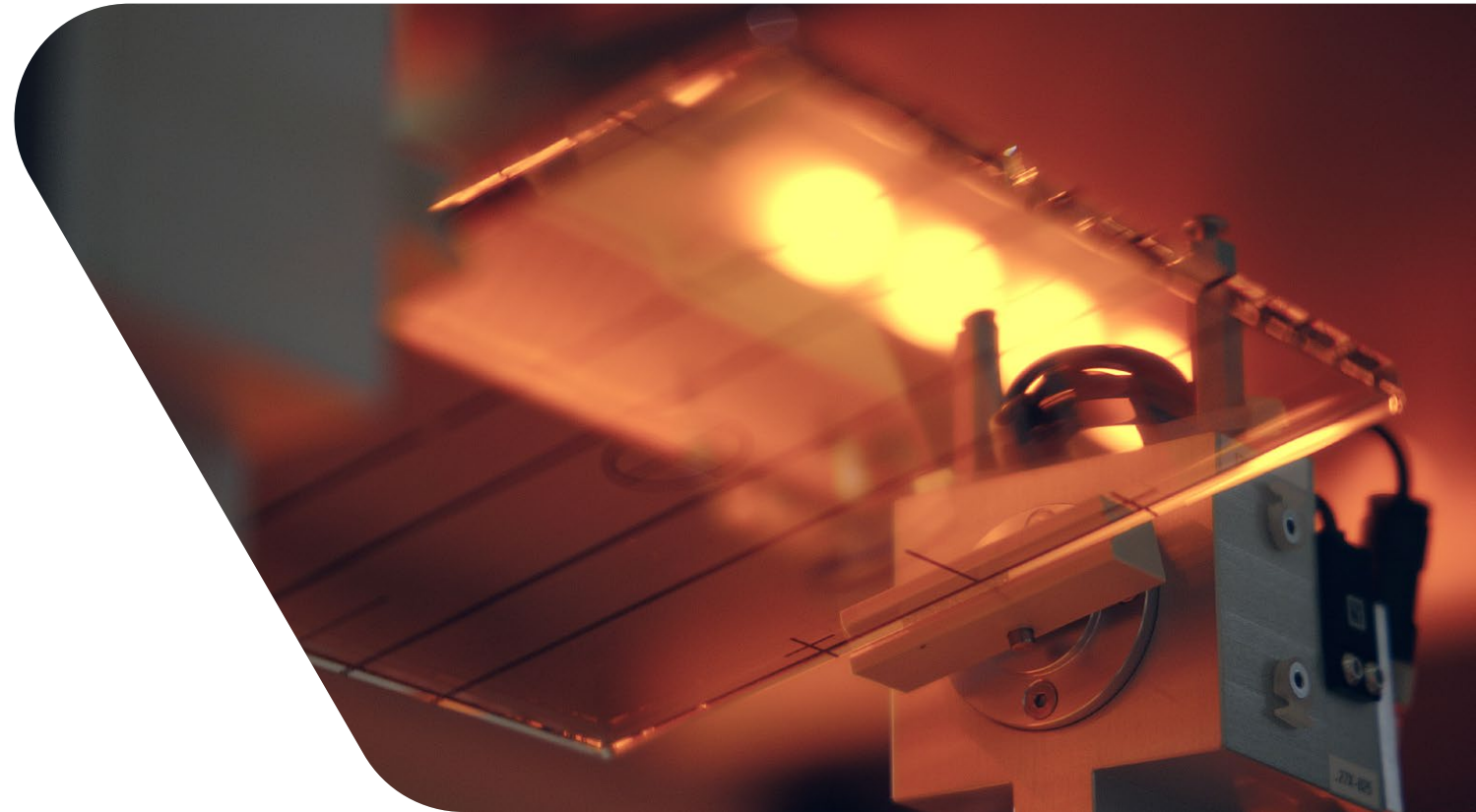
What does this mean for me?

Question

A new customer wants to pay an invoice from several accounts and with a combination of several payment methods (e.g. cash and cheque). What should you do?

Answer

This is suspicious behaviour that may indicate money laundering. Ensure that the company's internal approval process for this customer is carried out correctly in order to ensure that the delivery of the ordered goods does not conflict with foreign trade regulations. You should also inform your manager and the person responsible for the exports.



3

Transparency and reliability

**We act
transparently
and reliably
towards our
shareholders**





3. Transparency and reliability

We protect our company property and expertise by always handling business information responsibly and with the required degree of confidentiality, while protecting the personal data of our employees, customers and business partners.

a. Dealing with company property and expertise

We are committed to handling SUSS's company property as well as the property of third parties (e.g. customers, suppliers) with care. In addition to hard assets, company property also includes communication facilities and intangible assets such as expertise and intellectual property.

Our inventions and patents, brands and expertise are of particular importance for the long-term success of our company. Knowledge of confidential internal processes may only be used by employees for operational purposes. It must always be kept secret and protected against unauthorized access by third parties. "Third parties" in this sense may be family members or SUSS employees who have no official knowledge of the project or process in question. This obligation continues after termination of the employment relationship. This also includes a prohibition of the publication of internal, confidential or customer-specific information to third parties on social networks or by other means. In addition, we must also protect information that has been made available to us on a confidential basis by external business partners.

What does this mean for me?

Question

You go to your workplace at SUSS every day using the public transport system. While traveling, you like to make business calls on your mobile phone. Is this a problem?

Answer

You must ensure that you do not inadvertently disclose sensitive company information in public places, such as taxis, trains, subways, airplanes, elevators or at conferences and trade fairs. If you urgently need to make a phone call, evaluate your surroundings, find the quietest possible place and do not use real names.

b. Orderly accounting processes

Open and effective communication with the capital markets requires accurate and truthful accounting. This applies equally to relationships with shareholders, customers, employees and business partners, as well as with the public and all relevant government agencies. The proper preservation of our financial records in general is therefore essential for us. As such, we must retain all documents, files and other communications in accordance with our internal policies and international laws.

Accurate and complete management of our financial reports is important to our:

- Credibility and reputation
- Legal and regulatory obligations
- Ability to make accurate forecasts and business decisions
- Responsibility towards our shareholders and other external stakeholders

What does this mean for me?

Question

It's the last week of the quarter and your manager wants to make sure your team achieves the forecast sales targets for the quarter. You are asked to record a sale now, even though the signing of the contract is not scheduled until next month in the new quarter of the year. You think that this will not harm anyone in the company. Can you record this unconfirmed sale?

Answer

No. Such an action would be considered a misrepresentation and recording the sale in the wrong period could trigger international investigations for accounting fraud. Costs and revenues must be posted within the correct time periods. The sale has not yet been completed and can therefore not be recorded. Speak to the Compliance Officer well in advance.





c. Data protection and information security

Personal data may only be collected, processed or used to the extent necessary for specified, explicit and legitimate purposes. A high standard of data quality and technical protection against unauthorised access must be guaranteed. The use of the data must be transparent for the data subjects, their rights to information and rectification as well as to object, block and erase, if applicable, must be safeguarded.

Some jurisdictions (e.g. EU) have stricter laws and regulations regarding the retention and use of personal data. We expect all employees to comply with the regulations in order to protect the personal rights of others. This also especially applies to the handling of customer and supplier data as well as to that of all other business partners. All employees are required to pay particular attention to the protection of confidential data.

Regardless of personal data, information security is of paramount importance to us. The financial and reputational risks are high. Therefore, we adhere to all applicable information protection and cyber security policies, requirements and guidelines. To protect the company from risks, all employees continuously participate in our security programmes and self-learning courses. We aim to continuously promote and improve understanding and awareness of cyber security.

What does this mean for me?

Question

An unknown market research company calls you at your workplace and tries to get you involved in a discussion about the use of blogs and internet conversation forums on international trends in the semiconductor industry. The longer the conversation takes, the more eagerly the market researcher tries to explore personal data. Should you trust the verbal assurance that all your answers will be treated confidentially?

Answer

No. Please refrain from disclosing personal or protected and confidential information. Be very careful with so-called “phishing” attempts applied under the guise of unsuspecting market research. Ask for written information and inform our Compliance Officer.

d. Public reporting and communications

SUSS is primarily focused on sustainable growth of the company. In addition to the interests of our shareholders, we also take into account the interests of our clients, employees, suppliers, lenders and other stakeholders.

We observe and comply with the communication principles set out in the Compliance Guidelines and coordinate external publications with the Corporate Communications department. In particular, we critically review planned reporting for accuracy and completeness. Our primary goal is not to knowingly present facts in an inaccurate or misleading manner or to induce other persons to make inaccurate or misleading presentations.

When expressing opinions in public, at events or in social networks where we are recognisable as SUSS employees, we take care to identify personal views as such.



e. Handling insider information

Insider information is any specific information about circumstances that are not publicly known, that relates to a SUSS company, and that is capable of significantly influencing the stock exchange or market price of SUSS if it becomes publicly known.

Our employees are generally permitted to trade in shares or other securities of SUSS MicroTec SE, taking into account the company's internal insider information regulations. Abuse of inside information is prohibited. We do everything necessary to prevent insider trading.

In accordance with legal regulations, the following is prohibited without exception:

- to acquire or dispose of shares or other securities of SUSS MicroTec SE that are traded publicly (so-called insider securities) for their own account or for the account of a third party using insider information
- to disclose or make accessible inside information to another person without authorisation
- to recommend or otherwise induce another person to acquire or dispose of insider securities on the basis of insider information

What does this mean for me?

Question

A listed supplier of measuring instruments approaches you confidentially and informs you about a measuring instrument that is soon to be launched on the market. This new technical solution cannot be used for SUSS for the time being. But you believe it will be a real breakthrough for other business customers. Once a market breakthrough has occurred, you are pretty sure that the supplier's share price will shoot up. Are you allowed to buy securities from this supplier privately?

Answer

You must not buy any securities of the supplier until the public knows about the new product. This is insider information because this product launch was and is confidential. Full and fair public disclosure has not yet taken place. The information is also material because an investor would likely consider this information important in making an investment decision in favour of that supplier.

f. Avoiding conflicts of interest

SUSS respects the personal interests and private life of its employees. At the same time, we also expect our employees to be loyal to our company. It is therefore important to us that personal interests do not interfere with business decisions.

We avoid situations in which personal or financial interests conflict with those of SUSS. Even the appearance of a conflict of interest can damage the reputation of SUSS and should be avoided at the outset. Business decisions are always made for the benefit of the company.

If there are conflicts of interest, disclose them in good time and of your own accord and seek a workable solution together with your manager.

Examples of possible conflicts of interest:

- Investing in a competitor, supplier or customer company and entering into business relationships with these groups of people in a private environment
- Accepting membership on the board of another company
- An unauthorized secondary business activity
- Accepting or giving benefits or gifts
- Exercising an important higher level of public office²
- The exercise of a significant higher public office by a close family member or relative³

² Politically exposed persons (PEPs) especially include persons with the following functions:

- Heads of State, Heads of Government, Ministers, Members of the European Commission, Deputy Ministers and Secretaries of State,
- Members of Parliament and members of similar legislative bodies,
- Members of the executive bodies of political parties,
- Members of supreme courts, constitutional courts or other high courts, against whose decisions there is normally no further right of appeal,
- Members of the management bodies of courts of auditors,
- Members of the governing bodies of central banks,
- Ambassadors, Business Owners and Defence Attachés,
- Members of the administrative, management and supervisory bodies of state-owned enterprises,
- Directors, Alternate Directors, Members of the management body or other similar functions in an intergovernmental international or European organisation

³ Dependents include the spouse or registered partner, a child and their spouse or registered partner and each parent.



What does this mean for me?

Question

A delivery company delivers a defective component. You know that the warranty period for the component has not yet expired. However, the supplier is a company that belongs to your father-in-law and you are considering not having the defect reported and remedied.

Answer

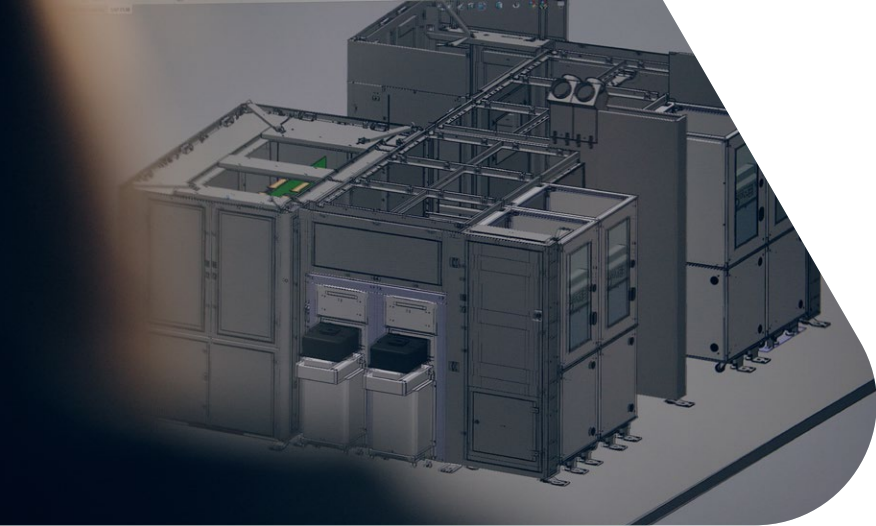
Your business decision must not be influenced by your private relationship with the supplier. It is your duty to act in the interest of SUSS. Inform your manager about the faulty product. This obligation applies to you regardless of possible private relationships with the supplier. Furthermore, you are obliged to disclose your personal relationship with the supplier as soon as you are aware that there is a potential conflict of interest so that someone can settle the matter in your place.

4

Responsibility for the environment and society

**We are aware of
our responsibility
to the environment
and society**





4. Responsibility for the environment and society

Our aim is to reconcile profitability, people and the environment. We want to live up to our social responsibility within society. It is important to us that natural resources are used sparingly, as this is the only way we can continue to operate sustainably and grow together.

a. Protection of the environment and climate

We are clearly committed to our responsibility towards the environment, including climate protection. Environmental responsibility and sustainability are values in their own right and an integral part of our business model.

All of us have a personal responsibility to protect and handle natural resources with care. Improvements in the ecological properties and environmental compatibility of our products are also an important part of our development work in the company.

What does this mean for me?

In order to protect our environment, we pay particular attention to the following obligations:

- We avoid harmful environmental impacts from emissions or try to limit them to the extent possible.
- We have hazardous waste disposed of by specialist companies.
- We regularly check our plants to ensure that no hazardous substances enter the groundwater.
- We handle energy and resources responsibly and efficiently.

b. Product safety

We aspire to produce the highest quality products. We only offer our products for sale when we are convinced of their safety and reliability. Our high production standards protect people and property from potential damage. We regularly review our processes and equipment to identify potential hazards at an early stage.



c. Donations and sponsoring

As a matter of principle, we do not make donations or promote sponsoring measures for political parties or party-like organisations at home or abroad. Donations and sponsorship measures for sporting events, charitable events or similar require the approval of the Executive Board.

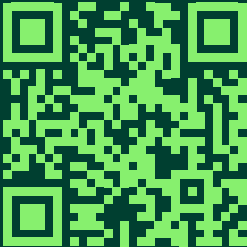
d. Social commitment

We take our responsibility and commitment as a global company seriously. We strive to be perceived as a trustworthy company and to live up to our responsibility towards society.

The aim of our social commitment is to make a positive contribution to society, for example at our company locations, and to build long-term relationships based on integrity, mutual respect and trust.

We encourage and support our employees who volunteer and make an important contribution to our society. For us, it does not matter whether these are political, social or charitable activities.





Visit www.suss.com/locations to find our nearest company representative or contact us directly:

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