



Elmos Semiconductor SE ESG Policies

Section:	Governance
Chapter:	Ethics and integrity
Policy:	Anti-trust law
Coverage:	Elmos Group
Supported UN SDGs:	   
Addressed GRI Standards:	206

Elmos condemns all forms of anticompetitive behavior. Violations of anti-trust law and misconduct in this area can lead not only to serious harm to Elmos's image, but also to fines, claims for damages, and even criminal charges brought against directors, officers, and/or individual employees. As a result, the Management Board and all employees are obliged to conduct themselves in accordance with anti-trust law and to uphold the rules of fair competition.

These rules include the fact that competitors are not permitted to coordinate prices or divide specific territories or customer groups between them. Competitors are also not allowed to share information about prices, supplier relationships and the terms involved, on quoting or bidding, or supply capacity. Employees are not permitted to impose requirements prohibited by anti-trust law on third parties, especially distributors, customers, and/or suppliers, nor are they allowed to make arrangements with these entities that would violate anti-trust law. This means anti-trust law encompasses both "horizontal" agreements between competitors and "vertical" agreements with business partners.

Our whistleblower system gives Elmos employees, our business partners, suppliers, customers, as well as the employees of our competitors a way to report anticompetitive or illegal behavior, including the field of anti-trust law. Elmos explicitly encourages reporting these violations.

Legally compliant behavior toward competitors is an integral element of the Elmos Code of Conduct and Elmos Supplier Code of Conduct. Elmos provides its employees with the necessary background information on competition and anti-trust law through online and in-person training activities. While the online training is aimed more at a larger audience, in-person training sessions deal with specific topics pertaining to smaller groups of participants. A special focus lies on employees who participate in association meetings or meetings regarding projects supported by external funding or grants as well as those who work in sales. Online training is typically held in partnership with external training providers, while in-person activities are organized by the head of our legal department.

Specific questions on anti-trust subjects are reviewed first by the legal department. External law firms are brought in for review in cases of doubt.

ESG policies	Compliance management system (CMS) Business ethics and anti-corruption Whistleblower system
ESG KPIs	Average hours of training per employee
Accompanying documents	Code of Conduct for Employees Code of Conduct for Suppliers and Business Partners Anti-Corruption Guideline