



## Elmos Semiconductor SE ESG Policies

Section: Governance  
 Chapter: Ethics and integrity  
 Policy: Business ethics and anti-corruption  
 Supported UN SDGs:



Addressed GRI standards: 102

Elmos condemns all forms of corruption and bribery and does not tolerate any conduct aimed at gaining an unfair advantage in business activities. We actively strive to adhere to our ethical principles and the Elmos Code of Conduct as well as combat corruption and bribery at our company. In addition, Elmos also has a group-wide compliance management system and its own Anti-Corruption Guideline. This includes rules such as bans on bribery and corruption, a guideline with maximum limits on handling gifts and invitations, obligation for correct accounting, obligation for maintaining the confidentiality of confidential information and a ban on anti-competitive conduct.

We take great care to ensure that our employees are not in unnecessary conflicts of interest, which is why it is important to identify situations early on that could lead to a conflict between personal interests and the interests of Elmos and prevent them from happening. A conflict of interest can arise as a result of family relationships or be of an economic or financial nature.

Employees are obliged to comply with legal regulations governing inside information. Inside information includes any information that is not in the public domain that is suited to significantly influencing the share price, if it were to be disclosed to the public. This kind of information must not be used or disclosed to third parties in an unauthorized manner. It must be ensured that relevant insider knowledge is stored securely in a manner that prevents any unauthorized access.

Specially trained compliance officers at headquarters and at important locations abroad monitor compliance with rules and laws. Moreover, they provide clear guidance to employees with compliance questions. All employees must take part in special compliance training that addresses different aspects of compliance and provides instruction for the areas in which they work.

Furthermore, Elmos undertakes to publish financial and non-financial information in an objective, credible, timely, fundamental, and complete manner.

<b>Accompanying documents</b>	Code of Conduct for Employees Code of Conduct for Suppliers and Business Partners Anti-Corruption Guideline
<b>KPIs</b>	Average hours of training per Employee