

Compliance Policy

Compliance Policy Statement

Sarfraah GmbH (hereinafter, the “Company”) is committed to fully comply with applicable laws and regulations to conduct our business activities. This policy has been established to describe our approach to compliance. The Company has strived to gain a reputation for lawful and ethical behavior, a reputation to which our colleagues, both past and present, have contributed since our beginning. Our reputation for high standards of business conduct and integrity is one of our greatest assets, as it enables us to continue to provide effective services.

The Company seeks to create value for its employees and society as a whole. The increase in our company’s value will only be long-lasting if we act within the law and in accordance with ethical principles. All employees are responsible for ensuring that their conduct is lawful and ethically appropriate. The above applies to employees at all the levels and in all the areas and countries of the Company. All our actions should be consistent with our good name and reputation. Our business partners, investors and the general public expect us to be competent, fair and reliable.

INTRODUCTION: WHY TO WORRY ABOUT COMPLIANCE?

Sarfraah GmbH is renowned as a company with obvious strengths. Although this reputation is the result of many years' work, the improper or careless actions of a single employee could damage our image in the blink of an eye. We must prevent the above.

This requires all employees to conduct their activities in keeping with the principles outlined in this Compliance Policy. Remember that the way in which each employee conducts the company's business may affect its image.

Corporate Compliance encompasses the legal behaviour of the company's employees. All employees are required to obey the applicable laws and the company guidelines in their work for the Company.

The Compliance Policy serves as a basis for the above. However, it does not cover every imaginable situation, nor does it outline every particular rule to be followed.

Infringements of the legislation and ethical principles may have serious and far-reaching consequences for the company, including:

- Financial penalties
- Administrative fines
- Claims for damages
- Confiscation of profits
- Prohibition against contracting
- Termination of business relations
- Attempted extortion or blackmail
- Damage to our image

Employees who violate the principles of this Corporate Compliance Policy faces serious consequences, such as fines, imprisonment, claims for damages, employment penalties and potential dismissal. Employees who disobey the rules will not be able to claim that they have acted in the company's interests, because any violation of the rules damages the company and its reputation. In view of the potential consequences, any benefit that someone has apparently obtained in a specific situation will not be beneficial to the company as a whole, not even from an economic perspective.

The Company seeks to succeed in the market by being innovative, with high quality standards, and to be reliable and fair. If the only way of closing a deal is to act unlawfully or immorally, we will refrain from doing so. An employee will never suffer reprisals for refusing to do business in such circumstances.

With the systematic implementation of this Corporate Compliance Policy, we demonstrate to our investors, competitors, business partners and the authorities that compliance forms an integral part of our corporate culture.

This Compliance Policy is intended to give employees a point of reference in their daily work, in such a way that it helps them to prevent violations of the standards and principles.

By definition, it focuses on areas of particular practical importance. However, it also encourages employees to familiarise themselves with the laws affecting them and to seek advice in the event of any queries, as lack of knowledge of a standard will not exempt them from complying with it or from the potential consequences of failure to comply with it. Employees can rely on their line managers or the legal department for support. In particular, employees should use these resources when third parties may be harmed, when they themselves are at risk, when there is a high risk or when the legal situation is ambiguous or confusing.

WE ARE COMMITTED TO MAINTAINING INTEGRITY IN BUSINESS; WE DO NOT ACCEPT CORRUPTION

Corruption is contrary to fair competition and damages the company's economic stability and reputation. Moreover, many countries regard corruption as a crime, regardless of whether the act itself is carried out in their jurisdiction or in another country. It is therefore strictly forbidden for the company employees to attempt to unlawfully influence their business partners by means of favours, gifts or offering other benefits anywhere in the world.

The Company will not do any business that entails a violation of the regulations or any infringement of the company's rules with regard to the offering or acceptance of favours, even though it is aware of the fact that some business may be lost. No amount of potential additional earnings or profits can justify unlawful business practices.

The above applies, without exception, to the entire Sarfraah GmbH employees. No employee is authorised to break the law or violate the company's standards.

Any gift, including those given indirectly (e.g. to friends, relatives or associations) is regarded as a benefit. Examples of the above include money, invitations to events, plane tickets, stays at hotels, employment for friends and relatives, special personal favours and the offering of expensive meals and drinks. Gifts should be offered and accepted in accordance with the law and the internal standards of the Company.

Under no circumstances are the company employees allowed to solicit personal gifts. It is also prohibited to offer or give cash gifts or gifts equivalent to cash to any public official.

During dealings with business partners, employees should avoid offering and accepting any gifts related to the negotiation, awarding or implementation of a contract, and any gift offered or accepted should be proportionate, in such a way that it is legally justifiable to both the giver and the recipient. In the event of any queries, please contact the your line manager or legal department.

WE ARE COMMITTED TO THE PRINCIPLE OF SUSTAINABILITY; WE DO NOT ACCEPT RISKS TO HUMAN HEALTH OR THE ENVIRONMENT

Sarfraah GmbH acknowledges its duty to meet the economic, ecological and social needs of present and future generations. In other words, we are committed to sustainable development. All the laws and

regulations related to the handling of hazardous materials should also be complied with. Prohibited materials may not be brought onto our premises

➤ Environmental protection - We believe that we can make a significant contribution to sustainable development by means of the efficient use of resources. Our commitment to reducing waste requires us to exhaust all reasonable possibilities to optimise our processes.

➤ Safety on the premises Industrial plants and facilities require careful planning and regular and systematic inspections and maintenance in order to prevent failures, accidents, emissions and significant risks. Employees who work at our plants/facilities should undergo thorough training, be given detailed work instructions and be appropriately supervised.

➤ Occupational health and safety Maintaining our employees' health benefits everyone, both the employees themselves and the company. Our employees share the responsibility for maintaining occupational health in the workplace. Special care should be taken when working with potential sources of hazards. All employees are required to strictly and consistently comply with the rules on safety in their respective workplaces, for their personal benefit and for the benefit of their colleagues and the company as a whole. When an incident occurs, the managers in charge should immediately inform the company units that are responsible.

WE ARE COMMITTED TO PROPER ACCOUNTING AND ISSUING TRANSPARENT FINANCIAL STATEMENTS; WE DO NOT ACCEPT FALSEHOOD, SIMULATION OR DECEPTION

Files should therefore be complete, tidy and easily understandable. All the documents and files should be kept in such a way that they can be delegated to a colleague at any time. Employees should retain the files throughout the period of time required by the laws and internal regulations and documents relevant to potential or ongoing administrative or judicial proceedings should never be destroyed.

Any kind of correspondence, whether it be a letter, a fax or an email (or even a verbal comment), should comply with simple educational standards and be clear and consistent in terms of its content, in such a way that it can be submitted or delivered to a third party (such as a court or tribunal, another governmental authority or an external audit). Comments attributable to the company that are inappropriate, confusing, incomplete or hasty may be extremely damaging because they may be misinterpreted, misused or taken out of context. Employees should be courteous and efficient when using email or other forms of online communication. The number of emails should be kept to a minimum.

The following guidelines are essential to ensure appropriate and timely financial statements:

➤ All accounting matters should be supported by comprehensive and proper documentation and duly recorded in the books. The accounting records and related documents should fully and accurately reflect all the business transactions and offer a true and accurate view of the company's assets.

➤ Each employee involved in the submission of information that is relevant to our financial statements is responsible for ensuring that said information is complete and correct.

- Sarfraah GmbH provides its stakeholders with regular and timely reports on the company's situation and relevant changes in its business in order to maintain the greatest possible degree of transparency.
- The annual accounts are published no more than 90 days after the end of the corresponding financial year.

WE ARE COMMITTED TO ENSURING THAT OUR WORKING CONDITIONS ARE FAIR AND BASED ON RESPECT; WE DO NOT ACCEPT DISCRIMINATION

Everyone has the right to be protected against discrimination and harassment of any kind at Sarfraah GmbH and in their contact with external people. The company expects its employees to be friendly, objective, fair and respectful in their relationships with colleagues and third parties, including customers, suppliers and public officials. They thus make an active contribution in protecting the good reputation of the Company.

The responsibility for maintaining these standards of conduct rests with each employee, not only their superiors. Non-compliance with these guidelines will not be tolerated. Any conflict should be reported to the employee's line manager or the human resources department.

WE ARE COMMITTED TO PROTECTING THE RESULTS OF OUR EFFORTS AND WE RESPECT THE LEGALLY ACKNOWLEDGED RIGHTS OF THIRD PARTIES; WE DO NOT ACCEPT VIOLATIONS OF OUR RIGHTS OR THOSE OF OTHERS

Care should be taken to prevent the involuntary transfer of know-how by means of the negligent handling of company information in public, (e.g. working with laptops in a manner visible to third parties or making casual comments in public or during presentations). Business information should be protected from unauthorised access by third parties. No employee may make copies of business documents or information files unless required to do so for work purposes.

WE ARE COMMITTED TO KEEPING CORPORATE AND PERSONAL INTERESTS APART; WE PREVENT CONFLICTS OF INTEREST

Particularly during working hours, the primary duty of employees is to promote the interests of the company. Conflicts of interest (even the mere semblance of such conflicts) should be avoided. A list of typical areas of conflict appears below. When a potential conflict of interest arises, employees should seek help from their line manager.

- Recruitment-related decisions: a person's individual interests and relationships should not influence recruitment-related decisions.
- Business relationships with third parties: business relationships with third parties should be established upon the basis of objective criteria (e.g. price, quality, reliability, technological level, product appropriateness or the existence of a long-lasting and obstacle-free business relationship).
- The execution of a contract or the continuation or termination of a business relationship with a third party should not be influenced by personal relationships or interests or tangible or intangible personal benefits.
- Contracting suppliers and our other business partners for personal purposes: if an employee wishes to place a personal order or enter into another contract with a person or entity that has a pre-existing business relationship with Sarfraah GmbH and said employee is in a position to directly or indirectly influence the company's business relationship with the supplier or business partner in question, the employee should inform his/her manager in advance and receive the manager's approval before proceeding.
- Use of the company's employee services for personal purposes: bosses and managers may not abuse their authority by taking advantage of the company's employee services for personal purposes.
- Use of the company property (e.g. equipment, vehicles, office supplies, documents, files and information storage media): Employees may not use items belonging to the company for their personal purposes or remove said items from the company's premises without their managers' express consent. In addition, no company information, program or document may be copied or removed from the company's premises without authorisation.
- Use of Internet and the email system: The company provides access to Internet and electronic communication for business purposes. Occasional and insignificant use of the Internet connection may be made for personal purposes during individual breaks.
- This authorisation may be revoked at any time. Use of the Internet for personal purposes should be strictly limited in terms of its duration and should not interfere with the employee's duties.
- Use of the email address provided by the company is solely for business purposes. The email address should not be used for personal purposes.
- External jobs: any employee who intends to accept employment with an external company (including as a consultant or advisor) or establishes his/her own business, must inform his/her superior of the above. The above applies in particular to positions within companies that do business with Sarfraah GmbH or compete or could compete with it.
- Freedom of expression with regard to employees' personal opinions: when expressing their personal opinions in public, employees should not give the impression that said opinions represent those of the company.

WE ARE COMMITTED TO COOPERATING WITH THE AUTHORITIES; WE DO NOT ACCEPT THE TRANSMISSION OF PARTIAL OR INAPPROPRIATE INFORMATION

All employees responsible for gathering company information for its submission to the regulatory authorities should report said information in a complete, clear, correct, timely and understandable manner.

When employees are contacted by an authority, such as the police or the public prosecutor's office, whose work involves investigating potential legal violations or initiating processes due to offences, the corresponding legal department should be immediately informed. In particular, information or documents should only be delivered once the corresponding legal department has been contacted to provide assistance.

HOW DOES THIS POLICY AFFECT EACH INDIVIDUAL'S DAILY WORK ROUTINE?

All Sarfraah GmbH employees must abide by this Compliance Policy.

This policy seeks to protect both the company and its employees. It also defines the framework within which the company employees can act with confidence and with which they can personally benefit, given that, among other advantages, it protects employees from discrimination and establishes rules on occupational safety. Compliance with it is therefore for the benefit of the employees, both as individuals and as important contributors to the success of the company, success from which the employees benefit.

All employees must undertake to review their own behaviour in the light of the guidelines set forth in this Corporate Compliance Policy and ensure that said guidelines are complied with. All the managers should organise their areas of responsibility to ensure adherence to the Corporate Compliance Policy. In particular, the managers should publicise the rules applicable to their areas of responsibility, assess the adherence thereto and enforce them.

Problems should be actively addressed and resolved. Each manager is expected to set an example in their area of responsibility, acting with integrity and thus ensuring that the Compliance is internalised as a fundamental part of the company's culture.

It is obligatory for all employees to immediately report any infringement of the Corporate Compliance Policy.

Any non-compliance with the Corporate Compliance Policy should be reported by the employee to his/her superior or the legal department.

When employees suspect corruption or intentional misuse of the company's property or finances, such as embezzlement, fraud, abuse of trust or the offering or acceptance of bribes, they should promptly report the matter directly to the CEO / Managing Director. It lies within the scope of the latter to analyse the non-compliance and its extent and to take the corrective measures, given that its members, as the company's agents and administrators, are responsible before the law.

Immediate disclosure of this kind of information is also likely to prevent the company from being more seriously harmed or to at least enable it to mitigate said harm. Employees should therefore report this kind of information to the above-mentioned persons and departments, as said departments have the power to take the necessary legal action.

The company will ensure that no employee is harmed as a result of reporting a potential violation of the regulatory compliance, acting in good faith. If the employee who reports the noncompliance is involved in a violation of the Corporate Compliance Policy, the company, when deciding upon any action to be taken against said employee, will take into account the report made by the latter, as well as any timely collaboration that he/she provides in the investigation of the potential violation so as to prevent further harm to the company.