

# Code of Conduct

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## Our code's purpose

This Code of Conduct is one of the ways we put the values of Screening Eagle Technologies AG and all its affiliates (hereinafter SET) into practice, reinforce ethical behavior and promote high standards of corporate governance (the Code).

The Code is built on SET's corporate values of integrity and compliance and reflects what we stand for, what we want to be and the traits we will use to get there and the behaviors that strongly reinforce and advance our business goals, providing the basis to assess our performance not only for what we achieved, but also for how we did it. So please do read it, understand it and embody it in our actions. And if you have a question or ever think that one of your fellow colleagues or SET may be falling short of our commitment, don't be silent. Speak up and take action.





## Who should follow this code

The Code applies to and must be followed by anyone who works for or represents SET. This includes SET directors, officers and employees.

SET's leaders, including all line managers, have additional responsibilities when it comes to ethics and compliance. They are compliance stewards for the organization and are responsible not only for achieving business results, but also for driving a culture of integrity throughout the organization. Our leaders must at minimum:

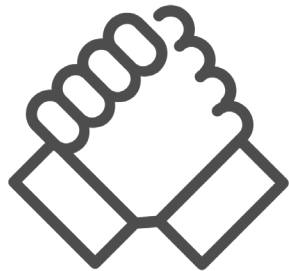
- Know and anticipate business compliance risk areas that may affect team operations and take proactive steps to mitigate such risks, set goals to track compliance and ensure their team is trained to deal with the risk areas.
- Communicate regularly with their team about the importance of compliance and demonstrate visibly and actively – through words and behavior – their personal commitment to the Code and its policies.
- Emphasize the value of reporting potential compliance concerns promptly and foster an environment of open reporting where employees feel comfortable raising concerns without fear of retaliation.
- Hire and promote only those people who have high standards of integrity and reward and recognize employees who go above-and-beyond with respect to compliance.





## Support and respect each other

SET welcomes diversity as an asset. As an international company, we have a multi-cultural environment with individuals from many different countries, backgrounds and cultures.



We can only appreciate the contribution of each individual if we observe normal standards of courtesy and respect when interacting with one another. Clear and regular communications, diversity, equality of opportunity and upholding health and safety are essential to fostering a work environment in which everyone will feel welcome and comfortable.

SET prohibits unlawful discrimination or harassment on the basis of race, color, religion, status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law, and effectively responds to harassment, discrimination, misconduct, abusive conduct and retaliation.

Employment at SET is based solely upon individual merit and qualifications directly related to professional competence. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of those with disabilities.

Everyone is expected to do their utmost to create a supportive work environment, where everyone has the opportunity to reach their fullest potential, while being free from harassment, intimidation, bias and unlawful discrimination. Please read the applicable employee regulations that cover in greater detail how we should conduct ourselves at work.



# Privacy

We respect privacy and hold ourselves up to the highest standards in relation to protecting personal data.



We collect and store personal information from employees, collaborators and partners around the world lawfully and carefully. We build privacy and security into the design of our products and services and employ appropriate safeguards to protect personal data against unauthorized access, use or disclosure.

Rules to follow:

- Only access and use the personal data that is necessary to fulfil your assigned job responsibilities.
- Collect, process, store or disclose data only in line with local law and SET internal policies and Data Privacy Policy and requirements defined in our customer contracts.

- When storing personal data, ensure it is in a protected environment. Do not leave personal data on a printer, shared server, or publicly accessible computer or website.

If you suspect a breach of personal information, you should report it immediately to your Manager or the IT team, so it can be managed efficiently and effectively.



## Safe and healthy workplace

We take personal responsibility for the protection of health and safety while at work. We will only achieve our goal of zero injuries with the commitment of all personnel to achieve this goal.



It is our duty to our colleagues, their families and their communities to safeguard the health and safety of every employee at work. We practice good ergonomics in the workplace to minimize the risk of injury or harm and adhere to safety procedures, rules and regulations while performing job activities and when handling products or materials which may cause safety or health hazards.

Managers are responsible for ensuring that all reasonable safeguards and precautions are taken in the workplace, promoting safe work practices and the use of personal protective equipment. It is also imperative to report dangerous conditions and other unacceptable health, safety or environmental conditions immediately so that workplace accidents are minimized, and corrective actions can be taken.

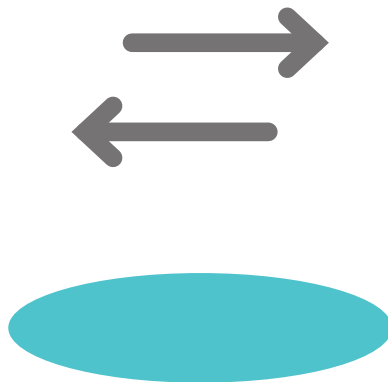
Substance abuse is incompatible with the health and safety of our employees, and we don't permit it. Consumption of alcohol is not banned at our offices, but we ask that you use good judgment and never drink in a way that leads to impaired performance or inappropriate behavior, endangers the safety of others, or violates the law. Illegal drugs in our offices or at sponsored events are strictly prohibited.

We are committed to a safe, healthy and violence-free work environment. Behavior that poses risk to the safety, health or security of all of you, our extended workforce, or visitors is prohibited. If you become aware of a risk to the safety, health or security of our workplace, you should report it to your Manager immediately. If it is life-threatening or an emergency, call your local police, fire, or other emergency responders first - and then report it to your Manager or SET Management.



## Conflicts of interest

We act in the best interests of SET and our shareholders and use SET property and resources primarily for SET's benefit and to support SET's business needs.



A conflict of interest arises in situations where an employee or collaborator has competing professional or personal interests, making it difficult to fulfil his/her duties impartially. A conflict of interest itself may not necessarily be a problem, but it must be promptly disclosed and properly managed otherwise it may cause others to question your integrity and loyalty to SET.

Rules to follow:

- Ensure that nothing interferes with your ability to make all business decisions in the best interest of SET in an objective and unbiased basis.
- Obtain prior approval before (i) hiring, promoting or directly supervising a family member or close friend or (ii) accepting officer or director positions with an outside business or not-profit organization.
- Do not use SET products, services, internal tools, or information in a way that improperly benefits you or someone you know or creates the appearance that you have an unfair advantage over users outside of SET.
- Do not accept gifts other than those of nominal value from suppliers, customers or competitors.
- Disclose if your personal or financial activities may interfere or have the potential of interfering with your allegiance toward

SET or that may create an appearance of impropriety such as:

- a. making personal investments in companies that are SET competitors or business partners when the investment might cause, or appear to cause, you to act in a way that could harm SET;
- b. performing non-SET work during SET business hours or using SET resources, intellectual property, or confidential information for non-SET-related work;
- c. starting your own business if it will compete with SET;
- d. developing or helping to develop outside inventions that (i) relate to SET's existing or reasonably anticipated products and services, (ii) relate to your position at SET, or (iii) are developed using SET corporate resources.

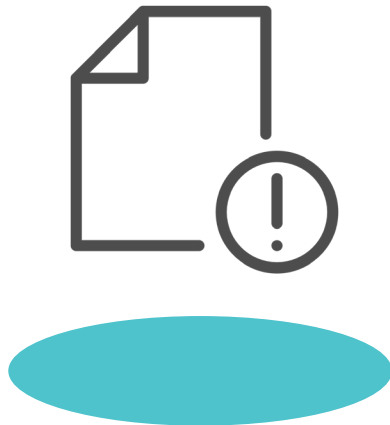
Business opportunities discovered through your work here belong first to SET, except as otherwise agreed to by SET in writing.

When considering a course of action, ask yourself whether the action you're considering could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at the expense of SET. If the answer is "yes," the action you're considering is likely to create a conflict of interest situation, and you should avoid it.



## Preserve confidentiality

Getting public attention around our innovations, products and services is positive, however, certain kinds of company information, if leaked prematurely into the press or to competitors, can hurt our product launches, eliminate our competitive advantage and prove costly in other ways.



Our responsibilities extend beyond not revealing confidential SET material, we must also:

- Properly secure, label and (when appropriate) dispose of confidential SET material.
- Safeguard confidential information that SET receives from others under non-disclosure agreements.
- Take steps to keep our trade secrets and other confidential intellectual property secret.
- Make sure that such information is classified and marked as “confidential”, kept secure and limit access to those who need to know in order to do their jobs.
- Avoid discussing information in areas where you may be overheard, such as airports, public transport, restaurants and bars, elevators, restrooms and cafeterias.
- Disclosure of confidential information to an outside party should be made on an “only as needed” basis and only under a confidentiality agreement and subject to a prior security assessment of the outside party who is to receive the confidential information.
- If you have family or other personal relationships with people employed by our competitors or business partners, as in most cases, common sense applies. Don’t tell your significant other or family members anything confidential - and don’t solicit confidential information from them about their company.
- Do not accept any confidential information from our partners and do not accept confidential information from other companies without first having all parties sign an appropriate non-disclosure agreement approved by our Legal team. You must not obtain confidential information from other parties by improper means or disclose it without authorization.
- Ensure your outside communications (including press, online and social media posts) do not disclose confidential proprietary information or represent (or otherwise give the impression) that you are speaking on behalf of SET unless you’re authorized to do so by the company.
- Check with your Manager before accepting any public speaking engagement on behalf of the company.

There are, of course, “grey areas” in which you will need to apply your best judgment in making sure you don’t disclose any confidential information. If find yourself in such position, be cautious in what advice or insight you provide or, better yet, ask for guidance.





## Protect our assets

SET strives to give you the tools you need, being either equipment or information, to allow you to be effective.



Our physical assets, intellectual property rights and information must be handled with care to avoid loss, theft or damage. Information assets include organizational charts, technologies and processes, manufacturing methods, as well as marketing, advertising and business development studies and plans.

SET's intellectual property rights (our trademarks, logos, copyrights, designs, trade secrets, "know-how", and patents) are among our most valuable assets. Unauthorized use can lead to their loss or serious loss of value.

Rules to follow:

- You must respect all copyright and other intellectual property laws, including laws governing the fair use of copyrights, trademarks and brands.
- You must never use SET's logos, marks, or other protected information or property for any business or commercial venture without pre-clearance from the Marketing Team.
- You shall not (i) grant licenses, rights, or access to our intellectual property or other information without authorization or accept intellectual property or confidential information without consulting our Legal
- Team, nor (ii) send sensitive information to unattended printers, discuss confidential information openly when others might be able to hear, or create written material without labelling it according to SET information classification and handling instructions.
- Respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose SET and you to criminal and civil fines and penalties.
- Seek advice from our Legal team before you solicit, accept, or use proprietary information from individuals outside the company or let them use or have access to SET proprietary information.
- Check with our Legal team if developing a product that uses content not belonging to SET.
- Company funds, tools, equipment and other physical assets are not to be requisitioned for personal use.
- Be careful not to release information that is commercially sensitive or contentious or may have undesired contractual or other legal implications for SET.



## Protect our assets

- Be sure to follow all security policies when using SET physical and intellectual property. If you have any reason to believe that our network security has been violated, for example, you lose your laptop or smart phone or think that your network password may have been compromised – please promptly report the incident to IT Team.
- Always secure your laptop, important equipment and your personal belongings, even while on SET's premises. Don't tamper with or disable security and safety devices.
- Our information systems' facilities must not be used to attack SET's integrity or third parties' networks or data. This includes originating or forwarding chain letters or unsolicited commercial e-mail (spam).

Follow SET's processes and engage our Legal team to help you properly harvest, protect and enforce intellectual property and confidential information rights, including the review of any conflict of interest situations that may impact our intellectual property.

Anything you do using SET's corporate electronic facilities (e.g., our computers, mobile devices, network, etc.) or store on our premises (e.g., letters, memos, and other documents) might be disclosed to people inside and outside the company. In addition, the company may monitor, access and disclose employee communications and other information on our corporate electronic facilities or on our premises where there is a business need to do so, such as protecting employees and users, maintaining the security of resources and property, or investigating suspected employee misconduct. Subject to applicable local legislation, SET reserves the right to supervise the use of e-mail and the Internet. All e-mail and Internet communications made through our facilities are treated as SET business information and so may be accessed, retrieved, monitored and disclosed by SET.



## Ensure financial integrity and responsibility

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. This is more than accurate reporting of our financials, though that's certainly important.



The money we spend on behalf of SET is not ours, it's the company's and, ultimately, our shareholders'. Each person at SET has a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. This matters every time we hire a new vendor, expense something to SET, sign a new business contract, or enter into any deals on SET's behalf.

SET maintains a system of internal controls to reinforce our compliance with legal, accounting, tax and other regulatory requirements in every location in which we operate. Stay in full compliance with our system of internal controls.

A core SET value has always been to spend money wisely. When you submit an expense for reimbursement or spend money on SET's behalf, make sure that the cost is reasonable, directly related to company business and supported by appropriate documentation. Always record the business purpose and comply with other submission requirements. If you're uncertain about whether you should spend money or submit an expense for reimbursement, check with your Manager.

Managers are responsible for all money spent and expenses incurred by their direct reports and should carefully review such spends and expenses before approving.

It goes without saying (but we're going to say it anyway) that you should never, ever interfere in any way with the auditing of SET's financial records. Similarly, you should never falsify any record or account, including time reports, expense accounts, and any other SET records.

Familiarize yourself with our policies. If you suspect or observe any of the conduct mentioned above or, for that matter, any irregularities relating to financial integrity or fiscal responsibility, no matter how small, immediately report them.



## How we do business

We should always strive for the best possible deal for SET.



While price is very important, it isn't the only factor worth considering. Quality, service, reliability and the terms and conditions of the proposed deal may also affect the final decision.

We strive to help our customers gain competitive advantage by adding value through the performance and quality of our products and services and abide by the following principles:

- All our communications and other interactions with our customers and partners should increase their trust in us. Timely, accurate and clear communication helps build our brand and what we stand for.
- Our products, features and services should make SET more useful for all our customers and partners;
- Part of being useful and honest is being responsive. We recognize relevant customer feedback when we see it - and we do something about it. We take pride in responding to communications from our users, whether questions, problems or compliments. If something is broken, fix it.
- Any time you feel our customers aren't being well-served, voice it. Continually improving our products and services takes all of us - and we're proud to take the initiative to step forward when the interests of our customers are at stake.

- Signing a contract or any other legally relevant document on behalf of SET is a very big deal, make sure to follow these rules:
- Each time you enter into a business transaction on SET's behalf, there should be documentation recording that agreement, approved by our Legal team and your Manager.
- Never sign any contract or legally relevant document on behalf of SET unless all the following requirements are met:
  - a. you have verified all the facts and completeness of the information and consider the underlying business rationale for the approval;
  - b. you are authorized to do so under our signature authority and approval policy;
  - c. you have studied the contract, understood its terms and decided that entering into the contract is in SET's best interest;
  - d. the contract and any amendments thereof have been approved by our Legal team and your Manager.

All contracts at SET should be in writing and should contain all of the relevant terms to which the parties are agreeing. SET does not permit "side agreements," whether oral or written.



## Dealing with government officials

SET engages with international government bodies at multiple levels and in a variety of ways.



When interacting with government officials and state-owned or controlled enterprises, we follow high ethical standards and act in a transparent manner. Special requirements apply to our interactions with government customers and state-owned enterprises, including, for example, rules relating to procurement, lobbying, entertainment, hospitality, disclosure and record-keeping.

Government officials include not only employees, agencies, and other representatives of national, regional, local, and municipal governments, but also employees of government-owned enterprises and anyone acting for, or on, their behalf, as well as close family members of government officials. State-owned or -controlled enterprises may include, for example, hospitals, oil companies, public utilities, railroads, airlines, TV stations, public universities, sovereign wealth funds, central banks and pension funds.

Business practices that are acceptable when dealing with private companies or partners, such as providing hospitality or certain pre-tender sales activities, may be unacceptable or illegal in government business. SET's policy does not permit participating in the political or electoral process through direct donations to political groups.

Below are some cases for your consideration when dealing with government parties:

- Before submitting a proposal to a government, review the requirements with

all applicable stakeholders and only accept those terms with which SET can comply.

- Verify that the officials have a right to information requested and that SET has a right to deliver such information.
- Do not deviate from a government's public procurement or tender process.
- Recruiting a government official or member of the official's family for employment at SET while the official is in a position to influence SET's business with the government may lead to perception of conflict of interest and may violate applicable laws and regulations regarding hiring from the government.
- Offering gifts or hospitality to government officials when the gifts or hospitality do not comply with applicable law, including local rules and regulations, as well as established SET's thresholds and approval requirements for corporate hospitality.
- Pay extra care in activities that might be perceived as an undue attempt to influence the behavior or decision of a governmental official.

Your personal political activity, such as support or advocacy relating to laws and policies or support for and donations to candidates for office, may be appropriate, but it must also be lawful, be conducted on your own time with your own resources - and in no way involve or be perceived to involve SET.



## Compliance with the law

SET takes its responsibilities to comply with laws and regulations very seriously and each one of you is expected to comply with applicable legal requirements and prohibitions. While it's impossible for anyone to know all aspects of every applicable law, you should

understand the major laws and regulations that apply to your work. Take advantage of our Legal team to assist you here. A few specific laws are easy to violate unintentionally and so are worth pointing out here.

## Trade compliance



SET is committed to comply with export control, economic sanctions and customs laws that regulate cross-border transfers of goods and technology.

Rules to follow:

- Consider and apply the applicable trade rules when arranging any cross-border transactions, including financial transactions, technology transfers, transactions that are free of charge, returns or hand-carried goods.
- Always know what you're exporting, its destination, the end user and use. Be sure to provide Customs with complete and accurate import documentation.
- Import and export documentation must be carefully archived for audit purposes.

- Follow "Know your Customer/Know your Supplier" procedures and ensure we do not do business with people or companies identified on government restricted party lists.
- Confirm all necessary licenses or authorizations are in place before any export transaction and adhere to all export license or license exception requirements.

If you are in any way involved in sending or making available SET products, services, software, equipment, or any form of technical data from one country to another, work with your Manager to be absolutely sure that the transaction stays well within the bounds of applicable laws. If you or your Manager are not sure, please contact our Legal team.



## Fair competition and antitrust laws

SET competes fair and square. In most countries there are competition or antitrust laws that regulate the activities of companies in the marketplace to ensure and promote free and fair competition for the benefit of consumers and market participants.



Compliance with competition laws and fair competition is part of our way of doing business and is important to our business strategy. Examples of prohibited conduct include:

- Agreeing with competitors about prices.
- Agreeing or aligning competitive behavior in the market with competitors to rig bids or to allocate or divide markets, geographic territories, customers, or sources of supply customers or markets.
- Agreeing with competitors to boycott a supplier or customer.
- Sharing or exchanging with competitors confidential and competitively sensitive information, such as cost and pricing information or other commercial conditions, future strategies, plans or product roadmaps, as well as tender offers or bids.

You are responsible for knowing and understanding applicable antitrust rules and principles and bear in mind that even informal discussions can give rise to competition issues. Take care with language in all documentation and communication, including e-mails and instant messages, to avoid expressions being misinterpreted.

Cooperation with competitors in the form of consortia, joint bidding or forming a joint venture, or other joint operations, entering into exclusive arrangements with partners restricting resellers' ability to set the resale price of products, or imposing restrictions concerning exclusive territories or customers requires consultation with our Legal team.



## Insider trading

Inside information is information not readily available to the public that an investor would consider important in deciding whether to buy or sell a company's securities.

Because inside information may have considerable value to investors, it is governed by legislation designed to preserve confidence in and the integrity of the securities markets in many countries.

Internally we share information, including non-public information, about SET's business operations freely or you may overhear a hallway conversation or come across a memo at a copy machine, either of which might involve confidential information. To use this non-public information to buy or sell stock, or to pass it along to others so that they may do so, could constitute insider trading.

The rules are simple: do not improperly use or disclose inside information for financial or any other personal benefit - and do not evade these guidelines by acting through anyone else or by giving inside information to others for their use, even if you will not financially benefit from it. Disclosing such information and trading securities while in the possession of insider information is both unethical and illegal and will be dealt with decisively.

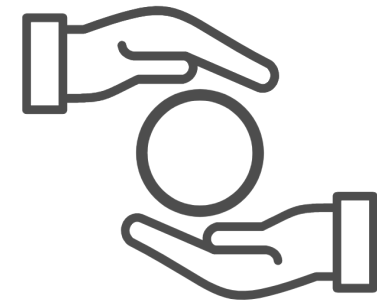






## Improper payments and anti-bribery laws

The rule for us at SET is simple, don't bribe anybody, anytime, for any reason.



We carry out business on merit. Engaging in any form of corruption undermines our values and exposes the individual and the company to unnecessary risk.

Corruption includes any abuse of position, public or private, for gain and it does not require money changing hands - offering, providing or receiving anything of value for an improper purpose is corruption. We will engage only reputable third parties who share our commitment to integrity. Bear in mind the following:

- An improper payment involves any transfer of value (not only cash, but also any other benefit, hospitality or thing of value) that is unlawful under applicable law or not permitted by the recipient's rules or SET's policies and procedures.
- Never give or authorize a third party to give a gratuity to a government official to expedite a service, such as customs or immigration clearances, permits, or issuance of licenses or approvals. Improper payments can expose you and SET to criminal prosecution.

- Seek advice if you are uncertain about the legitimacy of any payments or the purpose thereof.
- Be careful when you give gifts and pay for meals, entertainment or other business courtesies on behalf of SET.

Commissions or fees paid to agents and consultants must be reasonable in relation to the services provided. You must not agree or pay commissions or fees that could be considered to be improper payments. Agreements with consultants, brokers, sponsors, agents or other intermediaries shall not be used to channel payments to any person or persons, including public officials or customer employees.



## Anti-money laundering

Money laundering generally occurs when funds from illegitimate sources are brought into legitimate financial channels to hide them or make them appear legitimate.



Money laundering and terrorist financing can have a corrosive impact on a country's economy, security and government. Even remote association with such activities can severely damage SET's reputation and bring penalties and legal action. We do not do business with organizations pursuing the objective of committing crimes or securing financial gain by criminal means and commit to complying with all money-laundering laws throughout the world. You must protect SET's integrity and reputation by helping detect potential or suspected money laundering activities.

Employees who are responsible for making or receiving payments on behalf of SET must guard against the use of our funds, products and services for purposes of money laundering, terrorism financing or other criminal activity. Know our partners and customers and be alert to warning signs, which may include customers who (i) are reluctant to provide complete information,

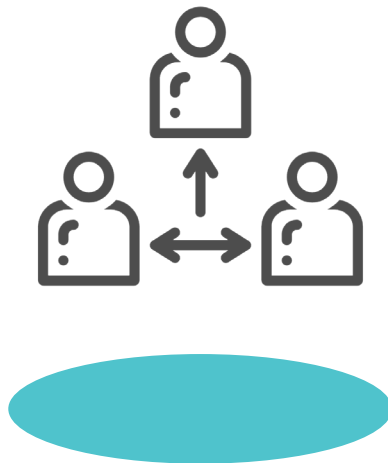
(ii) wish to make payments in cash or in currencies other than the currency specified in the contract, (iii) make over-payments and requests for refunds, or (iv) make unusual fund transfers to or from parties or countries not involved in the deal.

SET is committed to complying with all applicable financial record-keeping and reporting requirements and all other applicable anti-money laundering laws and regulations, as well as laws and regulations applicable to terrorist financing and facilitation of tax evasion. SET conducts business only with customers involved in legitimate business activities with funds derived from legitimate sources.



## Working with third parties

Third parties include any person, organization, or company with which SET contracts, including suppliers and commercial third parties.



SET seeks productive, ethical, and transparent relationships with its third parties. We expect all our third parties to be qualified according to our standards, to follow and exceed all applicable laws and regulations and to share the values expressed in our Code. We choose partners who will act in a manner consistent with this Code and comply with the requirements of the Code.

Our success also lies on building long-lasting relationships with partners who share our commitment to ethical business principles. The standards of any joint ventures should be compatible with ours.

Acting responsibly is firmly integrated in SET's procurement processes. We continuously develop our processes to ensure that working conditions in our supply chain are safe, that workers are treated with respect and dignity and that business operations are environmentally responsible. To increase transparency regarding the origin of raw materials and so-called conflict materials to detect risks early, we exercise due diligence on the source and chain of custody of conflict materials in our supply chain and conduct periodic inspections at our supplier's premises in order to verify supplier's compliance and adherence to applicable rules, standards and to our principles and values.

Slavery, the use of child labor and human trafficking are abuses of a person's freedoms and rights. SET is wholly opposed to such abuses wherever they occur. We have taken, and will continue to take, a number of steps that seek to ensure that slavery, child labor and human trafficking do not take place in any part of our business or our supply chain. We work proactively through standards and practices that prohibit our suppliers from engaging in forced labor, child labor or unfair labor practices.

Be familiar with key purchasing policies, compliance screening and onboarding requirements to ensure that we engage only third parties who will comply with applicable laws and policies, who share our commitment to ethical business practices and who will not tarnish our brand or reputation. Immediately raise a concern if you are asked to select or deal with a specific third party and/or deviate from the approved third-party selection and contracting process. SET will terminate business relationships with third parties who engage in questionable or unlawful business practices. Know and understand our policies on gifts, entertainment and hospitality. Report attempts by third parties to provide anything of value that exceeds our thresholds and approval requirements.



# Accredited calibration laboratory



## Impartiality

As an accredited calibration laboratory, SET is committed to and always provides all its calibration services in an impartial and objective manner. We ensure high level technical competence of the laboratory and a quality system that meets the specific requirements to run our laboratory according to the highest standards. Confidence in our laboratory's credibility and reliance on its results is key to achieve our goal of protecting the built world.

Impartiality of our laboratory means that no one can provide such services based on, pressured, or influenced by commercial, financial, or any other purpose which may hinder or harm our laboratory's independence and impartiality.

The laboratory shall assess and identify risks to its impartiality on a strict and on-going basis. These potential risks may include risks that arise from the laboratory's activities, from its relationships with internal or external parties, or from the relationships between its personnel. Any risk or conflict of interests shall be eliminated.

## Confidentiality

The laboratory is responsible and obliged to, through legally enforceable commitments, treat all information obtained through or created during the performance of its activities in a confidential way. The laboratory shall inform the customer in advance, of the information it intends to place in public domain. Except for information that the customer makes publicly available, or unless otherwise agreed between the laboratory and the customer (e.g., for the purpose of responding to complaints), all other information is considered and shall be regarded as proprietary information and shall be treated as confidential.

If the laboratory is required by law or authorized by contractual arrangements to release confidential information, the customer or any individual concerned, shall, unless prohibited by law, be notified of the information provided.

SET's laboratory carries great responsibility as the quality and reliability of our work has a direct impact on people and the built world. We work in line with our core values of being knowledge-driven, quality-driven and reliable-driven. Trust and professionalism are an essential part of our laboratory.

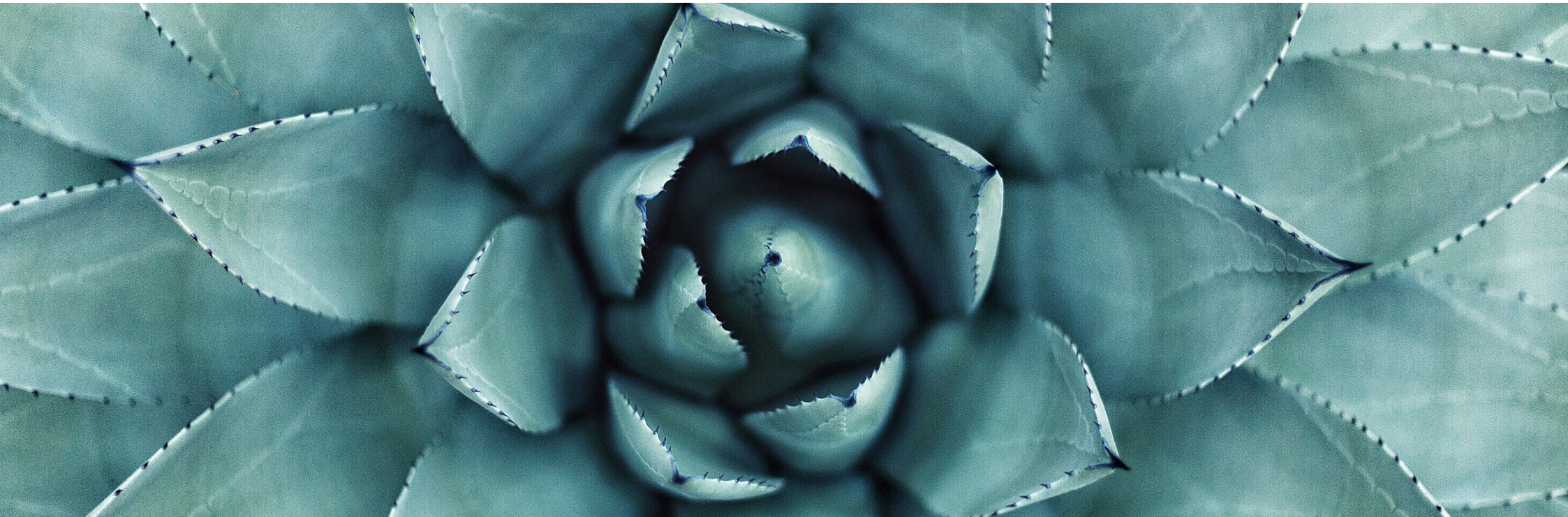




## **We are environmentally conscious**

We lead the industry towards having a positive impact by setting the example. We work continuously to reduce the environmental impacts of our products throughout their lifecycles, including design, procurement, manufacturing, use and end-of-life. SET enables customers and users to reduce their environmental footprints and adhere to the use of renewable energies and implement strict waste management in our facilities.

Be aware of the environmental impacts relevant to your work and how specific environmental requirements are met in your work function, such as product requirements in research and development or transportation selection in logistics. Each one of us has the responsibility to comply with the letter and the spirit of environmental laws and regulations and respect the environment, wherever they work.





## Speaking up and taking action

If you have questions related to the application or interpretation of the Code or laws and regulations applicable to SET, ask for help and seek guidance from your Manager, our Legal team or Human Resources representative.



If you become aware of a known or suspected violation of the Code, any SET policy or business-related legal requirements or laws, you must report it promptly to either your Manager, your Human Resources representative or our Legal team. All reports are handled as confidentially as possible, while still enabling SET to conduct a thorough investigation.

You can also submit a question or raise a concern of a suspected violation of our Code - or any other SET policy or law anonymously - by sending an e-mail to: [ethics@screeningeagle.com](mailto:ethics@screeningeagle.com).

SET prohibits any retaliation against individuals who, in good faith, report or cooperate in an investigation of a possible violation of our Code, policies or the law. If you believe you are being retaliated against, please contact our Legal team.

Failure to report a violation or suspected violation that you are aware of or refusing to cooperate with the investigation of a suspected violation will be considered as a breach of this Code.

Each one of you is responsible for ensuring that your conduct and the conduct of anyone reporting to you, fully complies with the applicable laws, this Code and the company policies.

We apply “zero tolerance”. SET may, at its sole discretion, consider and determine if a violation of this Code has occurred - and possible consequences, if any, for such violation. The consequences may vary from a written reprimand to termination of the employment of the individual in question. It may also include other measures that SET deems appropriate, depending on the circumstances of the case.

We take each concern seriously and will review and promptly address your concern for appropriate follow-up and resolution with careful and thorough attention. At the end of the investigation, if it is determined that an employee has violated applicable laws, policies, or the Code, corrective action may be imposed. We will share feedback, while respecting confidentiality, with the person who raised the concern and share lessons learned with the wider business.





## Our vision

SET aspires to be a different kind of company. It's impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our company. We expect all of you to be guided by both the letter and the spirit of this Code. Sometimes, identifying the right thing to do isn't an easy call. If you aren't sure, don't be afraid to ask questions.

We work together towards a big vision – protect the built world!

