

The Embedded Experts



Code of Conduct



Introduction

We at SEGGER Microcontroller GmbH, a company organized under the laws of Germany and domiciled in Monheim/Rhein, Germany, are committed to fairness, integrity, ethical conduct and compliance to applicable laws and regulations. We also believe this is the basis for the long term success of our company.

Guided by these fundamental principles for our actions, we are aware of our corporate social and environmental responsibility and thus this Code of Conduct is addressed to the entire company and to all employees.

Since such an understanding is also the foundation of mutual trust, confidence and of a successful collaboration we expect our business partners to share these principles and standards. It also demonstrates to the outside world that compliance with all laws and regulations is the central guideline for our conduct.

Compliance with Applicable Law as a Basic Requirement

We comply with all relevant legal rules.

We at SEGGER Microcontroller GmbH are committed to complying with all applicable laws and regulations. This applies to us as a company as well as to our employees. For us, the compliance with all applicable laws and regulations is the self-evident basic understanding of our entire business conduct.

The regulations cover important areas such as the integrity of business conduct, the prevention of corruption and conflicts of interest, the avoidance of

anti-competitive behavior, the prohibition of all discrimination, the compliance with the standards for labor conditions, the handling of resources and the protection of business and personal data. This Code of Conduct, however, cannot be regarded as an exhaustive description of the laws and regulations to be observed.

Integrity of Business Conduct

The integrity of business conduct is the guideline of our commercial activities.

We do not tolerate any form of corruption or bribery, regardless of whether it damages our company assets or the assets of third parties. We also avoid anything that could give the appearance of corruption or bribery.

We therefore do not offer or grant any gifts, invitations, favors or other personal advantages to our business partners or any third parties that could improperly influence their actions and decisions with regard to us.

We only offer or grant gifts and invitations if they can be classified as a customary and appropriate gesture according to the circumstances and therefore cannot

influence the behavior of the recipient (e.g. reasonable meals, low-value gifts).

We also only accept gifts and invitations from our business partners if they are within this framework and cannot be interpreted as influencing our actions and decisions with regard to our business partners.

During ongoing contract negotiations, we do not grant or accept gifts or invitations under any circumstances. Gifts in the form of cash, vouchers or similar monetary advantages are not acceptable at all.

We also do not involve third parties (e.g. consultants, representatives or other intermediaries) to circumvent these regulations.

Conflicts of Interest

We do not allow conflicts of interest to influence our decisions and behavior.

We separate our business and professional interests from our personal and private interests. We avoid situations in which conflicts of interest could impair appropriate decisions, or the performance and loyalty of the employee. This also applies to situations where there might be an appearance of a conflict of interest.

Sideline activities of our employees at companies with which we have a business relationship (e.g. sales, purchasing or services) or which are competitors are therefore not acceptable for us. We will also not enter into any investments in such companies that, due to their nature and extent, could influence our

professional conduct towards these companies.

Where conflicts of interest are unavoidable, we will disclose them to our supervisors within the company.

This includes situations such as professional contacts with close persons who work for a business partner or competitor. By close persons we mean the family members of an employee or persons living in the same household or shared apartment or friends of an employee.

Only by dealing openly with such situations can a conflict of interest be resolved, for instance by not involving an employee in a project that could give rise to such a conflict.

Antitrust and Competition Law

We respect the rules of fair competition.

We adhere strictly to the rules of competition and antitrust law. In particular, we do not participate in agreements that aim to restrict or weaken competition.

We do not exchange competition or market-relevant information or confidential business data with competitors. In particular, we do not share any information on prices beyond public listings on our website, sales volumes and territories or costs with competitors, nor do we accept such information from them.

Prohibition of all Discrimination

We strictly reject any form of discrimination.

We do not tolerate any discriminatory treatment, in particular towards employees or applicants, especially with regard to:

- parentage, origin and nationality
- gender, sexual identity and orientation
- religion and belief
- political, social or trade union activity
- age
- physical and/or psychological limitations

or in relation to other criteria that are not permissible under applicable law.

We also avoid any behavior that could be construed as discriminatory.

Compliance with the Standards for Labour Conditions

We adhere to the standards for labour conditions.

We at SEGGER Microcontroller GmbH respect the internationally recognized human rights, the United Nations Guiding Principles on Business and Human Rights and especially the core labour standards of the International Labour Organization (ILO).

SEGGER Microcontroller GmbH strictly rejects all forms of slavery, child labour, threats against people who defend human rights and other human rights violations. The protection of the fundamental human rights and labour rights is crucial for SEGGER Microcontroller GmbH. We expect our business partners to observe these principles as well.

We are committed to sustainability and environmental protection.

Not only do we make every effort to prevent environmental damage, but we also strive for an optimal ecological and energy balance. Therefore, we aim to develop and manufacture products that are particularly environmentally friendly and energy-efficient along the entire supply chain. During this process we strive to minimize our environmental impact, energy consumption and waste production. We expect our business partners to be guided by the same ideas.

We take care of operating resources.

We handle the company equipment provided to us with care and are responsible for their proper use and maintenance and for safeguarding them against theft, loss and misuse.

We do not use the equipment for private purposes, unless private use is expressly permitted.

We report any damage or loss of operating equipment to the supervisor immediately.

Confidentiality and Processing of Data

We maintain confidentiality.

We keep our business secrets and especially our intellectual property strictly confidential. This applies for us as a company as well as to all our employees.

We also respect the business secrets of our business partners and of third parties. If business partners share confidential information designated as such with us, we will keep it confidential. We expect our business partners to treat any of our business secrets and especially our intellectual property the same way.

We implement and adhere to the data protection regulations, including, but not limited to, those of the Federal Data Protection Act (Bundesdatenschutzgesetz - BDSG) and the General Data Protection Regulation (GDPR), when processing personal data.

The processed data include names, addresses and telephone numbers of the persons concerned. We take special care in not collecting any of the following data:

- racial and ethnic origin
- political opinions, trade union membership
- religious or philosophical convictions
- genetic data, bio-metric data, health data
- data on sexual life or sexual orientation

We process all personal data of our business partners and employees within the scope of the consent of the person whose data is processed and only for the purposes permitted under data protection law, e.g. within the scope of fulfilling a delivery order, inquiry or potential business opportunity.

Procedure in Case of Infringements, Concerns and Questions

We do not tolerate violations of the Code of Conduct.

In the event of violations of this Code of Conduct, or if any concerns or questions arise with regards to it, these will immediately be passed on to the management to investigate them appropriately, if necessary with the involvement of the Legal Department.

Employees who raise concerns in good faith make a significant contribution to the protection of the individual and the company. Therefore, all employees are called upon not to tolerate violations under any circumstances, but to report their observations and concerns to the management.

Ivo Geilenbrügge, Managing Director
Monheim am Rhein, October 2020
