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Policy revision history

Version number	Date	Description of changes
Version 1.0	June 2025	Initial version

1. SEMIDYNAMICS' SUPPLIER CODE OF CONDUCT

1.1. Introduction

SEMIDYNAMICS strives to be a **responsible business partner** and is, therefore, committed to the highest standards of integrity and social responsibility expecting all suppliers engaged when providing products and services to SEMIDYNAMICS, to have a similar commitment.

Accordingly, SEMIDYNAMICS expects all of its Suppliers in all aspects of their business to also (i) act with fairness, honesty, responsibility and integrity, (ii) adhere to any and all applicable laws, rules, regulations and legally binding authority decisions and (iii) commit to social and environmental responsibility.

1.2. Purpose

This Supplier Code of Conduct outlines the fundamental standards that reflect SEMIDYNAMICS' core values and must be followed by all Suppliers. It establishes the baseline for responsible business practices and represents a binding commitment in the relationship between each Supplier and SEMIDYNAMICS. Compliance with this Code is a contractual obligation and forms an integral part of all agreements between SEMIDYNAMICS and its Suppliers.

1.3. Scope

This Supplier Code of Conduct applies to all suppliers including (but not limited to) service providers, subcontractors, consultants, vendors, brokers, and agents.

On its turn, Suppliers shall contractually ensure in its overall supply chain compliance with the obligations set forth in this Suppliers Code of Conduct.

2. GENERAL EXPECTATIONS

Suppliers are expected to comply in their own business as well as in their supply chain with any and all applicable local, national, and international laws, rules, regulations, jurisdiction and legally binding authority decisions and to implement and maintain suitable measures and processes to ensure such compliance.

This includes, without limitation, the following commitments:

2.1. Commitment to Health, Safety and Labour Rights

SEMIDYNAMICS expects its Suppliers to promote a safe, inclusive, and respectful working environment by upholding human rights and ensuring fair labor practices.

2.1.1. Honest and respectful treatment: Suppliers shall treat all individuals with respect and fairness and shall foster a respectful, inclusive, and supportive working environment.

2.1.2. Equality, diversity and inclusion: Suppliers are expected to treat their employees, business partners and stakeholders with dignity and a spirit of trust and cooperation..

2.1.3. Non-discrimination: Suppliers must ensure a workplace free from discrimination.

2.1.4. Zero tolerance for harassment: Suppliers must uphold a work environment free from harassment and abuse.

2.1.5. Safe working conditions: Suppliers must uphold and respect internationally recognized labor principles:

- **Safe and hygienic working environment:** Suppliers must prioritize the health and safety of all their employees, contractors and other stakeholders by identifying and mitigating risks of accidents and occupational diseases;
- **No child labor:** Suppliers shall not employ workers under the legal minimum age or under 15 years, whichever is higher.

- **No forced labor:** All work must be voluntary. Suppliers shall not engage in any form of forced, bonded, or indentured labor.
- **Fair working conditions:** Supplier's employees must receive fair wages, working hours must comply with legal limits, and rest days must be respected.

2.2. Commitment to Intellectual Property, Data privacy and Security

Suppliers are requested to comply with all applicable laws, regulations, rules, and legally binding decisions related to data protection, trade secrets, and intellectual property.

2.2.1. Intellectual Property and Trade Secrets: Suppliers must respect Intellectual Property rights and must transfer technology and know-how in a manner that protects intellectual property rights.

2.2.2. Confidential and privileged Information: Suppliers shall ensure that any and all confidential business information or trade secrets gained by virtue of their business activities are held in confidence and not improperly used or disclosed to third parties.

2.2.3. Data protection: Suppliers must implement appropriate technical and organizational measures to protect the security and confidentiality of data.

2.3. Commitment to Business Integrity

Suppliers are expected to act ethically and transparently in all business interactions.

2.3.1. Compliance with Laws: Supplier must respect and ensure compliance with the laws of the countries in which they do business.

2.3.2. Transparent communication with customers: Suppliers are expected to communicate with all relevant stakeholders in a truthful manner, free from misleading or deceptive information.

2.3.3. Fair competition: Suppliers must not engage in anti-competitive behavior such as price-fixing, bid-rigging, or market manipulation. Suppliers will comply with any and all applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing for example with monopolies, unfair competition and restraints of trade, and relationships with competitors and customers.

2.3.4. Anti-bribery and anti-corruption: No form of corruption and/or bribery shall be tolerated. Suppliers shall not offer, promise, give, or receive bribes or other improper advantages, including improper exchange of money, loans, special privileges, personal favors, benefits, or services.

2.3.5. No money laundering: Suppliers shall not promote, facilitate, participate in, or conceal any transaction that could reasonably be expected to involve money laundering, nor engage in any transaction involving property that could reasonably be presumed that proceeds from unlawful activities.

2.3.6. Compliance with international Trade regulations and Export Control: Suppliers must comply with applicable international trade regulations, including export controls, embargoes, and sanctions, and other laws, regulations, government orders and policies controlling the transmission or shipment of goods, technology and payments. Specifically, Suppliers shall comply with export and import laws of Dual Use Goods and obtain the necessary authorizations for the export of such goods. Suppliers shall apply adequate controls to ensure its own and its suppliers' compliance with the applicable sanctions and export control laws.

2.4. Commitment to Corporate Social Responsibility

Suppliers are encouraged to operate responsibly and sustainably, integrating environmental, social, and governance (ESG) principles into their business practices. They should strive to minimize their environmental impact, responsibly manage resources, and contribute to long-

term positive outcomes for society and future generations, in alignment with SEMIDYNAMICS' commitment to innovation and responsible progress in the semiconductor industry.

2.4.1. Respect of Human Rights: Suppliers are expected to respect human rights and actively promote their observance. Accordingly, Suppliers shall observe any and all human rights set forth, for example, in the Universal Declaration of Human Rights of the United Nations, which requires each individual, every organ of society and, by extension, economic agents and businesses, to contribute towards the observation of these rights.

2.4.2. Environmental Sustainability: Suppliers must conduct their business in a manner that does not cause significant harm to the environment, in alignment with the DNSH principle as defined under the EU Taxonomy and other relevant frameworks. This includes:

- Identify, assess, and manage environmental risks and impacts associated with their operations, products, and services.
- Comply with all applicable local, national, and international environmental laws and regulations, including those related to emissions, waste, water use, and chemical management.
- Promotion of Sustainable Practices: Suppliers are encouraged to minimize greenhouse gas emissions; improve energy efficiency, use renewable energy sources where possible, reduce and properly manage waste, and conserve water and natural resources
- Implement practices that protect biodiversity and prevent ecosystem degradation, including avoiding deforestation and habitat destruction

3. COMPLIANCE WITH THIS SUPPLIER CODE OF CONDUCT

Compliance with the provisions of this Supplier Code of Conduct is of essence for the business relationship between SEMIDYNAMICS and the Supplier. Suppliers shall use their best efforts to be familiar and to comply with the values and principles stated in this Supplier Code of Conduct.

Suppliers shall encourage their suppliers and subcontractors likewise to ensure the implementation of as well as compliance with the values and principles stated in this Supplier Code of Conduct in its overall supply chain.

In case of a significant breach of this Supplier Code of Conduct, that is to be considered as a material breach of contract which gives SEMIDYNAMICS the right to terminate the business relationship with the Supplier partially or in total, subject to applicable laws.

SEMIDYNAMICS reserves the right and shall be entitled to appropriately and regularly audit Suppliers' compliance with this Supplier Code of Conduct.

4. BREACH OF THIS SUPPLIER CODE OF CONDUCT

If a Supplier becomes aware of a breach of this Supplier Code of Conduct or of any action that may be seen as incorrect or as potentially breaching this Supplier Code of Conduct, Supplier should immediately report it to SEMIDYNAMICS through the following communications channels:

- Vía postal address at SEMIDYNAMICS TECHNOLOGY SERVICES, S.L., Josep Tarradellas 20-30, 08029 Barcelona
- Vía email to the Chief Legal Officer at legal@semidynamics.com

Anonymous reports can also be filed through SEMIDYNAMICS' Whistleblower channel at <https://semidynamics.factorialhr.com/complaints>.

All reports received through these channels will be dealt with in accordance with the principles of confidentiality, respect, justification, privacy and security.

5. ACKNOWLEDGEMENT AND COMMITMENT

By entering into a business relationship with SEMIDYNAMICS, the Supplier acknowledges and agrees to comply with this Supplier Code of Conduct and to promote the commitments stated herein within its own supply chain.

SUPPLIER CODE OF CONDUCT ACKNOWLEDGEMENT	
By certifying compliance with SEMIDYNAMICS' Supplier Code of Conduct, the authorized representative <i>[Name of Authorized Representative]</i> , on behalf of <i>[Name of Supplier]</i> , agrees to:	
<input type="checkbox"/> abide by its principles. <input type="checkbox"/> report to the Company any violations of the Code. <input type="checkbox"/> cooperate in any investigations of violations of the Code.	
Signature	Date
Printed Name	