SUMMARY

"SENI S AG develops, manufactures and supplies advanced instruments for magnetic field measurement and electric current measurement as well as the corresponding development and engineering services. Our products and services and our growth and sustainability always stay in accordance with our customers' needs and satisfaction."

We conduct ourselves on the basis of professionalism, respect, fairness, honesty and teamwork. All employees at SENIS AG and its subsidiaries commit to meet the highest ethical standards when dealing with customers, partners, competitors, re-sellers and suppliers.

The following are our values:

- **Expertise**. We strive for advanced and high quality products.
- **Reliability**. We are responsible for providing reliable products and services.
- **Fair play in the market**. We oppose any form of corruption or bribery.
- **Respect**. We value all our employees equally. We do not tolerate discrimination of any kind.
- **Employee protection**. When developing, manufacturing, and supplying products, we strive for occupational safety and health care.
- **Environmental consciousness**. According to our Environmental Policy, we are fully aware of our responsibilities to the environment.
- **Honest communication**. Our communication to our business partners, to our employees, to the government bodies and supervisory authorities, as well as the media, is based on fairness, professionalism and respect.

SCOPE OF APPLICATION

The present Code of Conduct sets out the details of the requirements we must meet in terms of compliance and ethical conduct. We understand the term compliance to mean both adherence to our internal rules, as given in the Code of Conduct and guidelines, and observance of the corresponding statutory regulations. Business conduct is ethical wherever it corresponds to the general principles of integrity and decency, and where the people we deal with perceive it to be right.

GENERAL PRINCIPLES

SENI S expects all employees to strictly complying with the law, other binding regulations, and our internal rules. Violations of the law may be subject to high fines, they may result in our company being blocked both for public-sector and private-sector contracts and in further reaching sanctions being levied on us by government authorities, and they may expose us to claims for the compensation of damages – not to speak of the damage done to our reputation. In economic terms, the company will suffer losses, which in turn places the jobs of our employees at risk. Moreover, violations of the law may lead to the matter being prosecuted under criminal law. Employees who fail to comply with the laws and other binding regulations may be subject to disciplinary action and to claims for compensation of damages. SENIS will proactively follow up on any reports alleging violations of the law within the company, will involve the responsible authorities where required, and will cooperate with them.

ETHICAL CONDUCT

We at SENIS believe our responsibility is greater than simply complying with the statutory rules and other binding regulations. We expect our employees to conduct themselves ethically in all of their business activities and in any situations that such activities entail. Supervisors must act as role models. Anyone
working with external partners on behalf of SENIS bears responsibility as a representative of the company.

AVOIDING CORRUPTION

Corruption and bribery has devastating effects on societies, markets and businesses all over the world. We are committed to combating corruption and bribery and first and foremost by ensuring transparency to preventing even the slightest impression of corruptive behavior.

FAIR COMPETITION

SENIS is committed to ensuring that all competition is fair. Our clients choose us because of the high expertise and high quality of our work, at competitive prices. We refuse to be a party to any impermissible agreements in restraint of trade.

SOCIAL INTERACTION AND FAIR EMPLOYMENT

We are committed to the principles of respectfully dealing with one another in a fair and loyal way. All employees have equal opportunities when they are hired and in further growing their careers within the company. Discrimination of any form is prohibited.

SENIS guarantees that no form of illegal employment and exploitation of employees happens within the company. SENIS combats illegal employment and exploitation of employees amongst its suppliers and subcontractors.

CONFLICTS OF INTEREST

All of the employees at SENIS benefit from our company’s success. However, this success is enabled by each individual employee acting in the best interests of the company. Nobody may pursue private interests that are contrary to the interests of the company.

ADHERENCE TO THE CODE OF CONDUCT AND IMPLEMENTATION

This Code of Conduct is an inherent component of the company culture of the entire SENIS organization and its subsidiaries. Even small violations of this Code of Conduct can severely affect the reputation of SENIS and cause big damage.

Supervisors have the task of ensuring that all employees are aware of the Code of Conduct and the guidelines, that they are familiar with them and adhere to them. This requires personal dialogue, as well as organizational measures.

Reporting Misconduct In light of the significance that the proper conduct of all employees has for SENIS, adherence to the Code of Conduct and the guidelines is a task that all employees share. Where there are indications that someone within the company has violated them, we expect all employees to report such violation to their supervisor or to the executive management. No employee reporting (presumed) violations of the Code of Conduct or the guidelines in good faith, and who has not himself or herself done any wrong, need fear any reprisals for having filed such a report. Measures will be taken against anyone knowingly raising false allegations.
BUSINESS PARTNERS AND RE-SELLERS

SENIS also expects its business partners and re-sellers to act with integrity and to comply with the law. Therefore, we make the compliance with such standards a decisive decision criterion before entering new business relationships with suppliers, service providers, subcontractors or distribution agents. Current business relationships are revised whenever there is the suspicion that a business partner disregards such standards of compliance.

UN GLOBAL COMPACT

SENIS is not an official participant of the UN Global Compact because as an SME we do not want to handle the administrative work and the high costs associated with the official participation in the program. As an SME of our size we are nevertheless able to achieve all main goals in the fields of human rights, environment and anticorruption.

Our Code of Conduct is based on the UN Global Compact and hence also includes the following declarations and conventions: The Universal Declaration of Human Rights; The Rio Declaration on Environment and Development; The UN Convention Against Corruption. Additionally, the principles of the ILO Declaration on Fundamental Principles and Rights of Work are applied in the Labour Section of the UN Global Compact.

Zug, 14.06.2016

SENIS AG

S. Sposic, CEO