

## Code of Ethics

This Code of Ethics sets forth legal and ethical standards for directors and employees of SENIS AG and its subsidiary. This Code is intended to prevent wrongdoing and to promote the ethical conduct of all Company business.

### Compliance with Laws, Rules and Regulations

SENIS requires that all employees and directors comply with all laws, rules and regulations applicable to the business. You are expected to use sound judgment and common sense to comply with all applicable laws, rules and regulations.

If you become aware of the violation of any law, rule or regulation by the Company, whether by its employees or directors, or any third party doing business on behalf of the Company, it is your responsibility to promptly report the matter to your supervisor.

### Conflicts of Interest

Employees and directors must act in the best interests of the Company. You must refrain from engaging in any activity or having a personal interest that presents a "conflict of interest." It is your responsibility to disclose any transaction or relationship that reasonably could be expected to give rise to a conflict of interest.

### Confidentiality

Employees and management must maintain the confidentiality of confidential information entrusted to them in their capacity with SENIS AG. Unauthorized disclosure of any confidential information is prohibited. Additionally, employees should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees who have a need to know such information to perform their responsibilities.

### Honest and Ethical Conduct and Fair Dealing

Employees and directors should deal honestly, ethically and fairly with the SENIS's suppliers, customers, competitors and employees. Statements regarding the SENIS's products and services must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.



## Protection and Proper Use of Corporate Opportunities

Employees and directors must advance the Company's legitimate interests when the opportunity to do so arises. You must not take for yourself personal opportunities that are discovered through your position with the Company or the use of property or information of the Company.

## Accuracy of Books and Records and Public Reports

Employees and directors must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.

## Reporting and Compliance Procedures

Every employee and director has the responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding compliance with this Code. Any employee or director who knows or believes that any other employee or representative of the Company has engaged or is engaging in Company-related conduct that violates applicable law or this Code should report such information to his or her supervisor. Such reports should be made without any fear of retaliation. The Company will not discipline, discriminate against or retaliate against any employee who reports such conduct, unless it is found that the report was made with knowledge that it was false, or who cooperates in any investigation or inquiry regarding such conduct.

Zug, 10. May, 2019



SENIS AG  
S. Spasic, CEO

