



Sembach

TECHNICAL CERAMICS

Creating trust -
Shaping the future -
Our rules

Contents

Editorial	3
Context of the Organization	4
Code of Ethics and Conduct	12
Ethics Escalation Policy (“Whistleblowing Policy”)	18
Information Security Policy	22

Note: For reasons of better legibility, the simultaneous use of male, female and non-binary personal pronouns is not used. All personal pronouns apply equally to all genders.

This brochure is intended to provide you with essential information about Sembach Technical Ceramics' corporate policy.

Our corporate policy describes the environment in which we operate, what goals we have set ourselves and how we want to achieve these goals.

Our Code of Ethics and Conduct obliges us as a company and every employee to adhere to set rules when conducting our business activities.

Our Ethics Escalation Policy is intended to help identify and remedy violations of the Code of Ethics and Conduct.

With the Information Security Policy, we want to ensure that the requirements for corporate data protection are effectively implemented.

Please familiarize yourself with these documents so that you know what you, as an employee of this company, should look out for in your day-to-day work.

Let's shape the future of our company together.



Martin Sembach, CEO



Anna Sembach, CEO

Context of the Organization



Sembach Technical Ceramics has been producing Technical Ceramics for different applications for more than 100 years. Our components are used in motor vehicles, plant and machinery, energy technology, household appliances, instrumentation and control engineering.

Sembach currently generates most of its sales with customers who are at home in the automotive sector. Our products are mainly used in systems for exhaust gas measurement and aftertreatment and thus make an important contribution to environmental protection.

This area remains of great economic importance to us for the time being. Against the background of the social and political discussions about the future of the internal combustion engine, Sembach also assumes that in the long-term demand for the products manufactured today will decrease. To survive in the market, we must be profit-oriented in the medium and long-term. This also means that in the next few years we will increasingly look around for alternative products in other markets and market segments.

The competitive situation on the world market makes it inevitable that Sembach will invest in measures to rationalize and reduce costs as well as identifying ways to make our processes more efficient. The degree of automation in production will have to increase in the coming years. This also includes expanding the company with a new plant to be built in Lauf.

This new building also opens up opportunities for us to further reduce the environmental pollution caused by our company and to use energy even more efficiently. These goals are being pursued and implemented equally within the framework of the new building design and the framework of the economic opportunities of our company.

All these measures should enable the company to continue providing attractive and safe jobs for its employees for years to come. Qualified personnel are essential for Sembach to be able to meet both our own requirements and those set by our customers. This includes continuously improving the qualifications of our employees to meet the increasing demands on our processes and products. Occupational health and safety measures are intended to support employees in maintaining their performance.

Our goal is to position Sembach Technical Ceramics among the five leading manufacturers of Technical Ceramics over the next few years, to increase sales significantly, and to maintain a solid economic base.

Scope of application

To ensure these goals are achieved, we have identified the interested parties and their expectations of our company, assessed risks and opportunities, and aligned our integrated management system accordingly.

Sembach Technical Ceramics produces and sells parts made of Technical Ceramics from the site at Oskar-Sembach-Straße 15 in 91207 Lauf an der Pegnitz.

The scope of our integrated management system includes:

- Administrative and sales activities
- Process development
- Toolmaking for the production of ceramic parts
- Plant construction for the production of ceramic parts
- Procurement and storage of raw materials and resources, including water-polluting and hazardous substances
- Production of ceramic parts
- Material preparation
- Dry pressing
- Extrusion
- Injection molding
- Sintering
- Hard machining
- Quality control
- Storage, packaging, and shipping of ceramic parts
- Generation and handling of waste and wastewater
- Consumption of resources in the form of water, electricity, and gas
- Customer-specific requirements

as well as the related strategic and supporting activities to assure the processes.

Sembach manufactures ceramic components exclusively according to customer specifications. Product development in the sense of Section 8.3 of ISO 9001:2015 does not take place.

Since Sembach does not manufacture or sell any products with integrated software, we do not need to describe the corresponding

points of IATF 16949 (8.3.2.2, 8.3.3.1, 8.3.6.1, and 8.4.2.3.1) in more detail.

Sembach is a family-run company with flat hierarchies. This enables us to react flexibly to customer requirements. We have set ourselves the goals of positioning Sembach Technical Ceramics among the five leading manufacturers of Technical Ceramics over the next few years, increasing sales significantly, and maintaining a solid economic base.

Motivated and committed employees are our most important resource for this. We cannot successfully implement the requirements of our customers without them. That is why we train our employees in the best possible way to perform their tasks in the company and convey to them the impact of their work on the quality of our products.

To maintain the health of our employees, health and safety in the company are particularly important to us. Automation and technical aids are also used to relieve employees of physically demanding activities.

To be able to offer our customers high-quality products, we rely on long-term, fair, and cooperative partnerships with our suppliers. Compliance with the relevant legal requirements goes without saying.

In terms of sustainable production, we strive to align our production in such a way that the impact on the environment is minimized and natural resources are conserved in the best possible way. This also includes improving energy efficiency in our manufacturing processes.

Against the background of the technological change in our main sales markets, we are working specifically on opening up new business areas and technologies.

We are aware of our social responsibility. Sembach has therefore created a Code of Conduct for all employees, which also regulates the Anti-corruption Policy and has adopted an Ethics Escalation Policy ("Whistleblowing Policy").

Our company policy

The focus is on the customer - Our quality policy

With these measures and activities, we want to increase our customers' satisfaction and ensure the long-term success of Sembach and the jobs of our employees.

The requirements of our customers are the focus of everything we do. Satisfied customers are the basis for our success. We want to meet the requirements of our customers with reliable products and services, competent advice, and error-free order processing.

For us, this means that we avoid making errors instead of correcting them afterward. This also includes the continuous improvement of our processes. The pursuit of zero-defect production guides us at the same time.

The quality of our products depends on the quality of the raw materials and substances used. That is why we place the same high demands on our suppliers as we do on ourselves. We support our suppliers to the extent necessary in developing their quality management systems.

The continuous improvement of our services and working conditions is our constant goal. We see ensuring our high product quality as the mission of all employees. You are therefore expressly asked to support us with your ideas.

Conserve resources, preserve the environment - Our environmental and energy policy

Compliance with applicable laws and regulations is a basic requirement for our environmentally and energy-oriented actions. To this end, we engage in open dialog with the authorities, business partners, and the public.

Our goal is to keep operational environmental pollution as low as possible and to improve it. We conserve resources, minimize emissions, and avoid or recycle waste through targeted measures.

The continuous improvement of energy efficiency is of great importance when designing and implementing our processes. We record and document our energy consumption to identify any potential for improvement. Our goal is to continuously reduce our CO₂

emissions. In this respect, we are committed to reducing the environmental impact of our business activities as much as possible. This also includes the continuous improvement of our environmental and energy management systems.

Our employees are called upon to support us in implementing our goals with their experiences and ideas.

Our employees make an important contribution to the company's success. Healthy employees are an essential prerequisite for our performance.

Our goal is the continuous improvement of occupational health and safety within the company and the maintenance of the performance of our employees. For this reason, requirements have already been incorporated into the design of new plant and machinery as well as the operational processes.

We check the risk potential of all operating materials before procurement and, if possible, only use substances that are harmless to health. Where necessary, we provide employees with personal protective equipment.

The managers have a role model function for the company's employees. They always adhere to the statutory and company regulations on occupational safety themselves and also urge their subordinates to comply with them.

We ensure that employees are consulted and involved through the integration of the Works Council, the Committee for Occupational Safety, and the Safety Officer. In addition, all employees have the right to contact their superiors or senior management with information or suggestions.

The employees are our
most important capital
- Our health and
occupational safety
policy

Reliability and entrepreneurship

We see ourselves as a reliable and trustworthy business partner whose products and services are leaders in our industry. We face new challenges with creativity, openness, and ingenuity, and we react quickly and effectively to offer innovative solutions.

We stick to the rules - Compliance policy

We undertake to comply with the legal regulations when dealing with employees, customers, and suppliers.

To this end, our company has drawn up a code of conduct that is binding for all employees and has formulated an Ethics Escalation Policy (“Whistleblowing Policy”) which is intended to enable employees to report violations of the Code of Conduct.

We lead the way - Managers are role models

The executives of Sembach Technical Ceramics are responsible for ensuring that company policy is credibly presented, explained, and exemplified to all employees. They ensure that this policy is checked regularly and support the employees in implementing them.

This is how we as a company fulfill our responsibility towards our employees, our business partners, society, and the public.



Code of Ethics and Conduct



The senior management of Sembach Technical Ceramics is convinced that adherence to ethical values is necessary for long-term economic success. This includes treating each other fairly and acting within the framework of the specified standards in everyday business.

It goes without saying that we see the success of our customers as the key to achieving long-term and sustainable business success, constant growth, and meeting the requirements of all interest groups.

As senior management, we stand by our responsibility for a sustainable corporate strategy and its implementation. Integrity and compliance with the law and ethical principles are essential elements in maintaining the authenticity of our company.

This Code of Ethics and Conduct defines how we conduct our business in an ethical and socially responsible manner. In combination with our corporate policy in the areas of quality, environment, occupational safety, health protection, and energy, standards and directives are set that guarantee that our employees are treated with respect and dignity, have safe working conditions, and our environmental practices are sustainable.

This code contains the following:

- how our management meets its responsibility,
- how we treat our employees and how colleagues treat each other,
- what behavior customers can expect from us,
- how we deal with our suppliers, and
- how we behave when dealing with society, and the environment.

Each manager and each individual employee are responsible for behaving in accordance with this code. The behavior of our executives is a role model because they live the principles of conduct and are committed to them in every situation.

Human rights

We respect and promote the dignity of every human being and are committed to the protection and observance of international human rights. It goes without saying for us not to use any child labor and to reject all forms of forced labor. We do not tolerate any working conditions that conflict with international or local laws and practices.

Discrimination

We do not use any form of discrimination in recruitment, remuneration, training opportunities, promotion, termination or retirement, on grounds of race, ethnic origin, gender, age, marital status, religion or belief, disability or pregnancy, sexual orientation, union membership, or political party affiliation. Of course, we also expect our employees to take decisive action against such behavior.

Freedom of association and the right to collective bargaining

We respect the right of all employees to join, work for or establish unions or organizations of their choice for the purpose of promoting and protecting their interests, and we adhere to the relevant agreements for collective representation of our employees in accordance with the applicable laws and regulations.

Disciplinary action

Corporal punishment, mental or physical coercion, and verbal abuse are behaviors that we do not accept. Such behavior results in disciplinary measures up to and including termination of employment.

Motivation and training of employees

We consider motivated employees and their identification with the goals of our company to be an essential success factor. That is why our corporate policy emphasizes the advancement of our employees. We concentrate on job-related training that can be used in the company as well as the development and promotion of future leadership potential.

The health and safety of our employees are protected to the highest degree by providing a healthy and safe working environment. By complying with the safety regulations applicable in our company, each individual ensures a safe and healthy work environment.

We also offer our employees a voluntary health program, as well as training in all aspects relevant to health and safety. A doctor is available to employees at fixed times during working hours.

With our high-quality products and our reliability, we compete openly and fairly on the world markets. We do not get involved in any illegal and/or criminal practices, such as bid rigging that excludes, distorts, or restricts competition.

All our employees avoid situations in which their personal or financial interests conflict with those of the company. In particular, they are prohibited from taking a stake in the companies of competitors, customers, or suppliers or from entering into business relationships with them in a private environment if this would cause a conflict of interest.

Such a conflict always occurs when the type and scope of a stake are capable of influencing actions in the performance of our company's activities in any way.

Our employees distance themselves unequivocally from demanding or accepting unjustified or illegal benefits that could influence business decisions or transactions. Likewise, none of our employees will offer or provide improper benefits to or attempt to make any agreements to do so with business partners, their employees, or other third parties in business activities of any kind.

Health and safety

Compliance with antitrust and competition law rules

Conflicts of interest, bribery, and corruption

Protection of assets & confidentiality

The protection of the company's tangible and intangible assets, the confidential treatment of trade and business secrets, customer-related business information, and compliance with the applicable data protection principles, as formulated in our Information Security Policy, are expected of each individual.

Our suppliers

We have high expectations of our suppliers and require them to adhere to the same strict principles that we ourselves apply in the conduct of their business, especially in the treatment of employees. As an importer, we pay attention to the exact description and classification of goods and raw materials, the exact indication of their value, and the country of origin. Local customs and import laws, regulations, and procedures of state authorities are, as far as we are aware, expressly observed.

The environment & recycling

As a company in the ceramic industry, we are committed to nature. We protect our environment with state-of-the-art systems. Every employee contributes to the production of high-quality products in processes that keep the environmental impact as low as possible.

Due to the energy-intensive manufacturing processes of our products, we pay particular attention to improving the energy efficiency of our company. By using process energy, the company makes a significant contribution to conserving natural resources. By using reusable packaging, we also protect valuable resources.

Corporate citizenship

We expressly stand by our responsibility as citizens of the community in which we operate our business and commit ourselves to open communication with all authorities as well as social and public interest groups.

We are committed to this Code of Ethics and Conduct. Our employees adhere to this code of conduct without exception when carrying out their work.

Stricter or more detailed guidelines may apply to certain regions, countries, or functions, but these are generally in line with these corporate principles.

Any procedures, practices, or actions that conflict with this Code should be corrected and subject to disciplinary action.

If you have any questions about its application or interpretation, please contact your line manager or senior management. The regulations in our Ethics Escalation Policy (“Whistleblowing Policy”) apply to the reporting of potential violations.



Ethics Escalation Policy ("Whistleblowing Policy")



Our values are set out in our Code of Conduct for Employees. This Code helps us to adhere to the standards that we, Sembach, have set for ourselves. The way we work is designed to protect ourselves and create an environment where fairness, integrity, and respect are the norm.

It is up to all of us to make sure it stays that way. We all need to ensure that our values and ways of working are maintained and are relevant to our everyday activities. Sometimes that means we will get into difficult situations where we need to stand up and question behaviors or practices that we believe are wrong.

When that happens, it is important to remember that the company will support us all. It takes courage to speak out against unethical behavior. Anyone who finds this courage should know that we stand right behind them.

A clear and confidential internal process is available to employees who have something to report:

- Try to report incidents as soon as possible, ideally to your line manager.
- If you feel that you cannot do this, you can also contact one of your department heads, a member of Human Resources, or the Legal Department.

As a company, we stand by protecting anyone who stands up for our principles and ensuring that no retaliatory measures are taken against them. We only ask that the issues you reported are genuine. We take all reported issues very seriously, conduct investigations, and take appropriate action. Participation in illegal activities or undermining our principles will result in disciplinary or remedial action, which can include termination.

The objective of the policy

If you are an employee of Sembach Technical Ceramics or work on Sembach's premises, you may witness or suspect misconduct.

This policy tells you what to do if you discover misconduct in the workplace. Misconduct in the workplace includes any criminal offense, violation of the law, or willful violation of the Code of Conduct for Employees. This policy is not intended for general operational matters which you should report to your line manager in the normal manner.

Reporting an issue at work

If your concerns are genuine and you want to report them, please do so as soon as possible. Ideally, speak to your line manager. If you feel uncomfortable doing this or want to talk to someone else, you can contact a member of Human Resources or the Legal Department.

However and whoever you report the issue to, it will be investigated promptly and the person responsible for the investigation will do their best to ensure that it is treated confidentially. Your concerns will be taken seriously, and you will be informed of the measures taken, if necessary.

There is no need to fear dismissal or disadvantage for raising a genuine and understandable concern about workplace misconduct. If you are treated unfairly by someone for reporting such an issue, disciplinary action will be taken against that person.

Scope, responsibilities, and obligations

This policy applies to all legal entities that are fully owned by Sembach GmbH & Co. KG.

The senior management is responsible for overseeing compliance with this policy. This policy applies to all individuals who are employed by or perform work on Sembach Technical Ceramics' behalf, including subcontractors, temporary workers, and agency workers.



Information Security Policy



Sembach GmbH & Co. KG was founded in 1904 and is now in the 4th and 5th generations of the family, producing products made of Technical Ceramics. The core competence is the manufacture of products for the automotive industry, mechanical, and plant engineering, energy technology, household appliances, instrumentation and control engineering.

Information processing plays a key role in fulfilling the tasks of Sembach GmbH & Co. KG. Sembach GmbH & Co. KG has an enormous variety of tasks that are subject to constant changes. Economical and timely task fulfillment is based on the opportunities of information technology. No distinction is made between analog and digital information. Without adequate protection of this information, it is not possible to guarantee the fulfillment of tasks within the framework of the statutory mandate to the company. Against this background, all employees of Sembach GmbH & Co. KG must strive for adequate information security and ensure that it is sustainable.

The Sembach GmbH & Co. KG policy

- describes the importance of information security,
- defines the scope,
- contains the management's commitment to its responsibility for information security,
- defines the security strategy,
- formulates the general security objectives,
- defines the security organization,
- obliges us to continuously update the rules on information security,
- and defines the framework for the implementation and publication of the policy on information security.

The importance of information security for Sembach GmbH & Co. KG is measured by the importance of the availability, integrity, and confidentiality of stored, processed, and transmitted information. It must be taken into account that information technology in large parts of Sembach GmbH & Co. KG is now the leading and sometimes even exclusively used communication and work infrastructure. Such networked IT infrastructures are exposed to an increasing threat of attacks. In addition, the network is susceptible to the rapid spread of e.g., malware. In the area of information processing and communication, the availability, integrity, and confidentiality of the information processed transmitted must therefore be guaranteed through appropriate technical and organizational measures.

Importance of information security

Information security is for Sembach GmbH & Co. KG an essential core value for business continuity, especially for the following reasons:

- The legal regulations, for example on data protection, must be observed. Business secrets must be protected.
- Compliance with legal requirements such as compliance with the GDPR.
- Safeguarding the company's innovations and technologies.
- The effects of a possible case of damage or loss must be reduced to an acceptable level by taking appropriate precautionary measures.
- The value invested in technology, information, work processes, and knowledge must be preserved.
- An IT failure can severely restrict Sembach GmbH & Co. KG's ability to work.
- Loss of reputation and trust vis-à-vis contractual partners due to the breach of security objectives must be avoided.

Scope

This Information Security Policy applies to the whole of Sembach GmbH & Co. KG and must be observed by all employees who are connected to the internal network of Sembach GmbH & Co. KG or who have access to information belonging to Sembach GmbH & Co. KG. If external service providers are used who have access to information belonging to Sembach GmbH & Co. KG, the information security regulations for these service providers apply accordingly.

Senior management responsibility

The executive directors have overall responsibility for information security at Sembach GmbH & Co. KG. They appoint an Information Security Officer (ISO) to perform these tasks and issue this policy on information security as part of a procedural instruction.

The implementation of this policy and the resulting security measures are subject to constant review to identify and correct deficiencies.

The core values of information security, availability, confidentiality, and integrity must be achieved to the extent required not only for IT use but also for analog information processing. Every service, task, or piece of information is classified according to a protection requirement to determine the appropriate protection measure based on a risk analysis.

Sembach GmbH & Co. KG introduced an ISMS based on the ISIS12 standard (Information security in 12 steps) to maintain a security level based on the "IT baseline protection" approach. For this purpose, an "ISO" staff function has been appointed, who coordinates the necessary measures with the management and the senior management and is responsible for their implementation. The ISO reports quarterly to the senior management on the security situation of the company. Every employee is responsible for information security. Information security is one of the duties of all employees. A suitable level of information security can only be achieved if all employees assume their responsibility in their day-to-day work.

ISIS12 describes a sequential process that supports companies with the introduction of the ISMS. The implementation was carried out by running the 12 steps of the ISIS12 process model, which are divided into the following phases (PDCA, Plan, Do, Check, and Act):

- Step 1: Develop a policy
- Step 2: Sensitize employees
- Step 3: Build an information security team
- Step 4: Define the IT documentation structure
- Step 5: Introduce the IT service management process
- Step 6: Identify critical applications
- Step 7: Analyze the IT structure
- Step 8: Model security measures
- Step 9: Compare actual and target
- Step 10: Plan the implementation
- Step 11: Implement
- Step 12: Audit

- **Planning**

- Definition of the specifications for the security process and the ISMS

- **Implementation**

- Development of an ISMS, creation, and implementation of a security concept, and establishment of the security process

- **Verification**
Success monitoring of the achievement of the security goals
- **Maintenance**
Implementation of adjustments to optimize the security process and organization

The security strategy encompasses all information processing at Sembach GmbH & Co. KG. The ISMS defines appropriate security measures for the respective protection purpose and ensures their economic implementation. When selecting and implementing security measures, care must be taken to ensure that the required level of security is achieved without unnecessarily impairing the flow of business processes.

The security strategy is shaped by the following principles of information security:

- **Security for sustainable availability:** To achieve long-term availability, a short-term restriction in functionality and convenience is justifiable.
- **Protection requirement principle:** The protection requirements of IT systems are determined by the protection requirements of the data processed, stored, or transmitted by them.
- **Minimum principle for access:** Access to IT systems and data is restricted to the necessary people and systems.
- **Restrictive usage principle:** Each user only receives the access rights they need to perform their task.
- **Involvement of all employees:** All employees are involved in the security management process to support the security strategy and are made aware of information security.
- **The central role of information security:** Information security is taken into account right from the start with changes and innovations. The ISO must be supported in all questions relating to information security.
- **Proportionality of the security measures:** The expense and result of the security measures used must be in an appropriate relationship to one another.
- **Provision of sufficient resources:** To achieve and maintain an appropriate level of information security, sufficient financial, and human resources must be provided, and the latter must have the necessary time.

The following security goals are set for Sembach GmbH & Co. KG to reflect the high priority placed on information security:

- **Confidentiality**
Information may only be available to an authorized group of people.
- **Integrity**
The physical and logical integrity of systems, applications, and data must be maintained at all times. This includes protection against unauthorized creation or modification of information.
- **Availability**
Systems, applications and data must always be available to authorized persons as intended.

In achieving these goals, it is important to ensure that the funds used are proportional to the value of the goods worthy of protection. Due to the increased requirements for data protection, the data protection goals of authenticity, traceability, and transparency are also set as security goals:

- **Authenticity**
Personal data can be attributed to its origin at any time.
- **Traceability**
Who processed what data, when, and how is always traceable.
- **Transparency**
All activities in the planning, introduction, and operation of IT processes are predefined and documented. There are also suitable control options.

The abstract goals listed here are operationalized in a separate goal plan and regularly checked and updated.

The general security goals of Sembach GmbH & Co. KG are:

- Ensuring the confidentiality, availability, and integrity of all information in the organization
- Protection against attacks from the Internet that endanger the internal network
- Documentation of business processes and workflows
- Compliance with legal requirements and data protection laws
- Preservation of the value invested in technology, work, and business processes, and knowledge
- Safeguarding of trade secrets

Information Security Officer

Obligation to implement/involve employees

- Maintaining the confidentiality of data from our suppliers and customers
- Standardization of all facilities under one Information Security Management System (ISMS)
- Minimizing possible downtime and loss from system failures
- Establishing a strong awareness of information security within Sembach GmbH & Co. KG
- Avoiding claims for damages and averting image loss.

The Information Security Officer (ISO) coordinates and is responsible for information security at Sembach GmbH & Co. KG. They have the right to speak directly to the senior management.

The ISO is responsible for handling all information security issues within Sembach GmbH & Co. KG and can contact the senior management directly. Security concept measures are implemented based on risk assessments. Individual measures to improve the security level are specified and implemented in information security guidelines and procedural instructions.

Issued information security guidelines and procedural instructions are binding for all employees. To guarantee information security, the ISO is authorized to have IT systems and at-risk analog procedures completely or partially decommissioned and to work towards spatial and organizational changes. In the event of a current threat from the Internet, the network can be disconnected from the Internet. The senior management must be informed immediately.

All employees undertake to report incidents to the ISO that put information security at risk. Against the background of the above-mentioned security goals, appropriate evidence of compliance with all security measures must be provided and archived.

Every employee of Sembach GmbH & Co. KG undertakes to carefully handle the information available to them and to actively participate in the implementation of the measures to ensure information security. If required, the employees of Sembach GmbH Co. KG receive special security rules for the respective workplace, which in particular include

an obligation to report security incidents. All employees must take part in the regularly offered security training courses.

The undersigned has overall responsibility for information security. The expenditure for the provision of personnel and financial resources to ensure information security should create an appropriate level of information security for the systems used and planned.

The necessary resources and investment funds to implement the measures must be budgeted for.

The security concept is checked annually by the ISO as part of the information security process to make sure it is still up-to-date and effective and adjusted if necessary.

All employees are required to support and promote the topic of information security in accordance with this policy. Mistakes are human and can happen. A violation of the information security guidelines or procedural instructions can, however, result in culpable behavior for an employee under labor law, up to and including termination. Grossly negligent or intentional violations can lead to liability in the event of financial loss and thus to claims for recourse. Criminal law consequences cannot be ruled out in such cases.

Commitment to
continuous
improvement

Violations and penalties





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