

A background image showing a close-up of hands pointing at documents on a desk. The hands are in focus, with one hand pointing towards the right and another towards the left. The documents are slightly blurred, showing some text and a yellow sticky note. The overall tone is professional and business-oriented.

Code of Conduct





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Forward

**Regardless of the rules that apply for a specific market or business:
The longer a company operates, the more the company's success
hinges on the attitude of its leaders.**

Hans Huber Biography, quoted in B. Ruetz, "Dienen kommt vor Verdienen" (Serving Before Earning), pg. 11

Dear Employees,

As a trustworthy Value Creator, the SFS Group maintains an international presence in all end markets of relevance to our company. Integrity and ethical behavior are inextricably linked with our promise of "Inventing success together" because the successful solutions we created together are built on a sustainable foundation. As a company with locations in 35 countries and a culturally diverse workforce that has extensive expertise in numerous industries and speaks numerous languages, diversity is a natural part of our identity. Our shared values and our commitment to ethical business practices are enshrined in this Code of Conduct (CoC), which defines binding guidelines for our cooperation with customers, employees, suppliers, business partners, authorities and other stakeholder groups.

We live in a constantly changing world. Our era is shaped by rapid technological development and the rise of new working models. Business activities are increasingly being steered by a complex web of regulations. At the same time, our customers' expectations with respect to efficient and effective solutions are on the rise. To meet these challenges while simultaneously protecting the environment, our employees and society, compliance with this Code of Conduct is our top priority.

The CoC of the SFS Group is a globally valid guideline on correct conduct that applies to all employees and people in positions of

leadership in our company, from apprentices to members of the Board of Directors. The guidelines set forth in the CoC are binding and define our international minimum standards. Management at subsidiaries has the option of formulating stricter requirements. Additionally and independent of this CoC, the company is responsible for observing and complying with all relevant local laws and regulations. This approach enables us to ensure that our business practices are in compliance with ethical and legal standards at all times. Our CoC obligates us to report serious violations of these principles and to protect whistleblowers who report abuse with good intentions. These reports are important and help us ward off major damage to the company.

Managers have a duty to lead by example and a special responsibility to recognise risks at an early stage as well as to promote a culture that views whistleblowing as an opportunity. Together, we all strive to embrace these principles and, with them, a culture of openness and trust.



Thomas Oetterli
Chair of the Board of Directors



Jens Breu
CEO

General principles

Compliance with laws

We adhere to the respective laws and regulations that apply in all countries where we have operations.

If differences exist between national laws, the CoC and relevant international principles or guidelines, the stricter of the sets of regulations is followed. All employees are expected to have the required knowledge of applicable laws as well as the internal competencies inherent to their area of responsibility and to contact their supervisor or Legal if any questions arise.

Reporting violations

We strive to act responsibly, ethically and in compliance with legal requirements in all our business transactions.

Violations against laws and/or internal regulations may have consequences under labour, criminal or liability law and/or result in disciplinary proceedings.

If they become aware of any serious violations against laws or internal guidelines that could potentially damage the SFS Group, all employees are obligated to report such violations immediately to their supervisor, the local Compliance function, the Head of Segment, the HR organisation or the Group Compliance Office.

The list of local compliance officers is available on mySFS. Alternatively, employees can contact the Group Compliance Officer directly by phone (+41 71 727 63 73) or in writing (compliance@sfs.com →). Reports can also be submitted using the form provided on mySFS or via the external reporting channel on an independent third-party platform (<https://sfs-group.integrityline.app/> →).

Any retaliatory measures of any kind taken against employees who report such violations in good faith will not be tolerated (whistleblowers/reporting parties are protected). Employees who make frivolous, deliberately false and/or unfounded accusations or allegations must expect consequences.

Our responsibility as a member of society

Human rights

We believe that diversity is a competitive advantage, and we encourage everyone to respect the dignity of all human beings and pledge to be vigilant about and protect human rights.

We categorically reject all forms of exploitation, in particular forced or child labour and modern slavery, and ensure strict compliance with the relevant laws. Remuneration and benefits must at least be equivalent to the statutory minimum wage and in compliance with all applicable working hours regulations of the respective country. The same also applies for our suppliers and business partners (also refer to the Supplier Code of Conduct).

Equal opportunity and equal treatment

People, their experiences and skills as well as their unique personal characteristics are at the heart of our company. Along with our employees' diversity come unique ideas, perspectives, talents

and added value that have a direct impact on our success. We do not tolerate any discrimination or insults based on ancestry, ethnicity, gender, religion, age, physical or mental disability, union or political affiliation, sexual orientation, marital or family status.

The hiring, selection, training, promotion and remuneration of employees is based exclusively on work-related, objective criteria such as experience and performance. We ensure that employees receive anti-discrimination training and have established a transparent, clearly defined recruitment process.

We strive for diversity and promote integration in the workplace.

Protecting the environment

We not only comply with existing laws on environmental protection and sustainability but also make an active effort to avoid consuming non-renewable resources.

We are reducing our energy consumption and contributing to efforts to combat climate change by implementing state-of-the-art, environmentally friendly energy concepts on our company's premises and by launching several different initiatives aimed at reducing energy consumption; the efficiency of these measures is factored into our carbon footprint.

We strive to deliver products and services that take economic, ecological and social benefits into account across the entire life cycle. In doing so, we not only call on our customers and business partners to embrace sustainable practices but also create sustainable added value for all stakeholders.

The individual behavior of each and every employee helps us conserve natural resources and protect both the environment and the climate.

Our responsibility as a business partner

Integrity and avoiding conflicts of interest

We avoid every relationship or activity that could hamper our ability to make fair, objective decisions in our company's interest. A conflict of interest arises whenever business decisions are influenced by personal interests. Because of this, employees are not permitted to use their role as a means of obtaining personal advantages from business partners or competitors. To avoid conflicts such as this, employees must keep their private interests and the business' interests separate at all times so they can make impartial decisions for the benefit of our company.

Anti-bribery and anti-corruption

We do not tolerate corruption or bribery of any kind. Employees must avoid even the appearance of unlawfully influencing another person's decision in order to gain an unfair advantage. An unlawful influence can be exerted by offering, granting, demanding or accepting inappropriate perks or benefits. This zero-tolerance principle applies not only for our employees but also for all other people and organizations that act on our behalf or in our interest, including consulting firms or recruiting companies/services.

No free services are offered, promised or granted to business partners. The only exceptions to this are donations (see "Benefits"

below) and business meals that comply with our applicable internal guidelines.

Our dealings with public officials are fully in compliance with the law and in-house policies. Extreme restraint is advised in business dealings with public officials in particular.

Benefits

Invitations to meals or entertainment may only be accepted if they are considered to be appropriate in the normal course of business and cannot be construed as an attempt to influence employees in their business decisions.

Employees may neither accept nor give undue advantages such as inappropriate gifts, etc. Gifts of symbolic value can be exempted from this rule if they are not such that they could influence the business decisions of the accepting party nor cast doubt about their integrity. The acceptance of cash or cash equivalents (vouchers, etc.) is not permitted under any circumstances. Please consult the internal guidelines and conditions of employment. In case of doubt, gifts must be turned down.

Donations and sponsorships are approved centrally by the authorized members of management in the individual companies of the SFS Group. The process used for awarding such monies must be transparent at all times.

Anti-money laundering

We comply with all relevant national and international anti-money laundering laws and regulations. Our goal is to do business only with serious partners that are involved in lawful business activities and whose funds come from legitimate sources.

Cash is only accepted from identified business partners whose beneficial owners are known. The receipt of cash must be documented meticulously. The circumstances and purpose of any unusual business transactions must be clarified.

Taxes and customs duties

We deliver products and services to countries all around the world and promise to comply with all applicable import and export laws and regulations. This also applies to our responsibility to comply with national and international customs and tax obligations, especially when goods or services are purchased, brokered, manufactured or marketed or when technology is transferred or received. Whether official approval is required must be checked in advance.

Fair competition

We pledge to conduct our business with honesty, respect, integrity and in compliance with high ethical standards.

We are committed to the principle of fair competition and act in accordance with all competition laws. The illegal exchange of information, price fixing and/or market-sharing agreements with competitors or suppliers are strictly prohibited. We expressly object to espionage, theft and the use of other illegal methods of obtaining information regarding competitors or their business activities.

Confidential information from third parties and their know-how must be respected and protected. We only use information from outside the company if and to the extent that its use is legally permissible. Third-party industrial property rights (patents, samples and brands, etc.) must be respected and may only be used with permission from the respective owner of the property rights.

Our responsibility in the company

Health, safety and personal development

Protecting the health and safety of our employees and minimising risk are our top priorities. We are committed to ensuring full compliance with all relevant regulations, laws and standards on occupational health and safety. We also take great care to follow the specific safety regulations of every country where we have operations. Examples of preventive measures include risk assessments, reducing noise levels and training courses to ensure that the processes used at our locations are optimised.

Our employees must have enough time to relax. We comply with existing statutory and internal regulations on working hours, breaks and resting time.

We are committed to fair terms and conditions of employment and to preserving the rights of our employees.

We are committed to supporting our employees' personal and professional development. To that end, we offer a diverse range of career opportunities and further education programmes and conduct annual performance reviews so we can work together with employees to shape their career paths.

Data protection and information security

We have a collective responsibility to protect the confidential and classified information entrusted to us by our business partners and other interest groups just as carefully as we protect our own information. Furthermore, we are required to take appropriate steps to protect personal data against infringement, loss or unauthorised use. We pledge to adhere to an appropriate standard for data protection and information security.

Information must not be used for the pursuit of personal interests nor disclosed to third parties. Information about the company must be protected at all times, including by technical means.

Confidentiality and business secrets

Business and trade secrets must be treated as confidential information. Any information regarding business and operational matters obtained through collaboration with the company that has not lawfully entered the public domain is subject to confidentiality requirements and may not be passed on to unauthorised third parties.

Third parties are also deemed to include related parties or employees who do not have any official knowledge of the content in question. Furthermore, confidential and classified information may only be used for business purposes. This also applies after the employment relationship has been terminated.

Communication

We communicate actively, openly and honestly with employees and external persons.

Statements we make and documents we create are correct and truthful.

Only the Group Executive Board and the employees it authorises may communicate with the media.

Company assets

The facilities, work equipment, business documents, IT equipment and data that are made available to us for our work are the property of SFS. We must handle these items carefully, sparingly and responsibly at all times and never use them inappropriately. Use of the IT and communications infrastructure, systems and services for illegal or unethical purposes is not tolerated under any circumstances.

