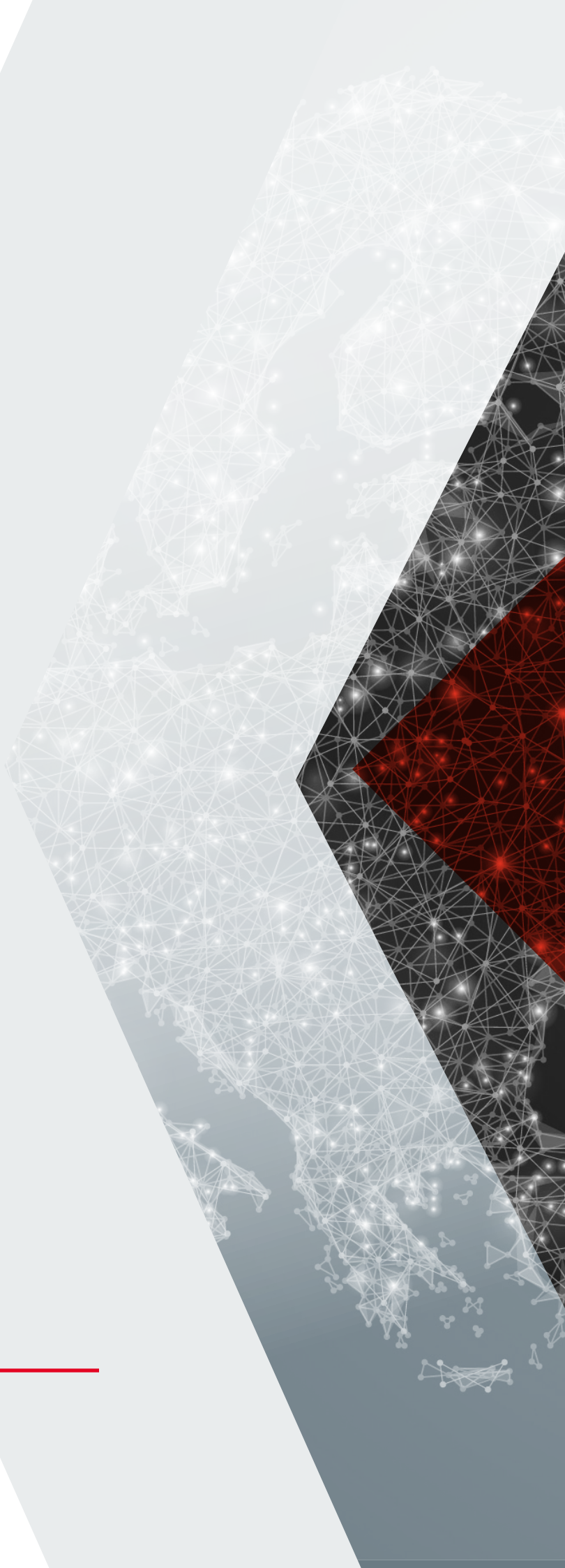


# Angst+Pfister Group Code of Conduct

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Dear Colleagues,

We, as colleagues and members of the Angst+Pfister Family are the most important drivers of our culture development by living our multicultural values.

The Angst+Pfister Group success is based on these values, pursuing an accountable conduct of business and close relationships with our partners. Our positive reputation and brand image give us the opportunity to gain decisive competitive advantages. This allows us to continuously attract new talents, grow our business and further develop our outstanding products, our material expertise, our engineering capabilities as well as our supply chain excellence.

We are committed to build trust and loyalty among our customers, partners and suppliers, and we are proud of our strong positioning regarding ethical standards in the conduct of our business. We believe that the fulfillment of our multicultural company values should go hand in hand with commercial achievements and result in our success, and respectively the success of our partners.

Every member of the Angst+Pfister Family, regardless of her or his position, is empowered and expected to act according to the highest ethical standards and with integrity as defined in the principles of this document.

We are particularly proud to see the commitment and passion each of you demonstrates every day. This Code of Conduct is the basis for all our actions and will further shape our culture of integrity, trust, fairness and respect.



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Christof Domeisen  
CEO and Delegate of the Board  
Angst+Pfister Group



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Marc-Antoine Chariatte  
CFO Angst+Pfister Group


## Purpose

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Our Code of Conduct expresses our commitment to comply with applicable laws and regulations, to foster fairness and inclusion, a fair competition and to assume social and environmental responsibility.

The principles enable all employees to appropriately handle ethical and legal issues and guide them through sensitive topics. Lawful and responsible conduct must be the default objective for all of us. It is the responsibility of each leader to ensure appropriate communication within her/his area of responsibility; likewise, each employee shall use reasonable efforts to utilize all available resources to know which policies apply to her or him.

The principles are complemented by additional company policies, procedures, guidance documents and manuals issued by the various subsidiaries and business units. In some cases, those complementary rules may be stricter than the standards in this Code of Conduct and, if so, the stricter rules apply.

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# Our Values & Principles

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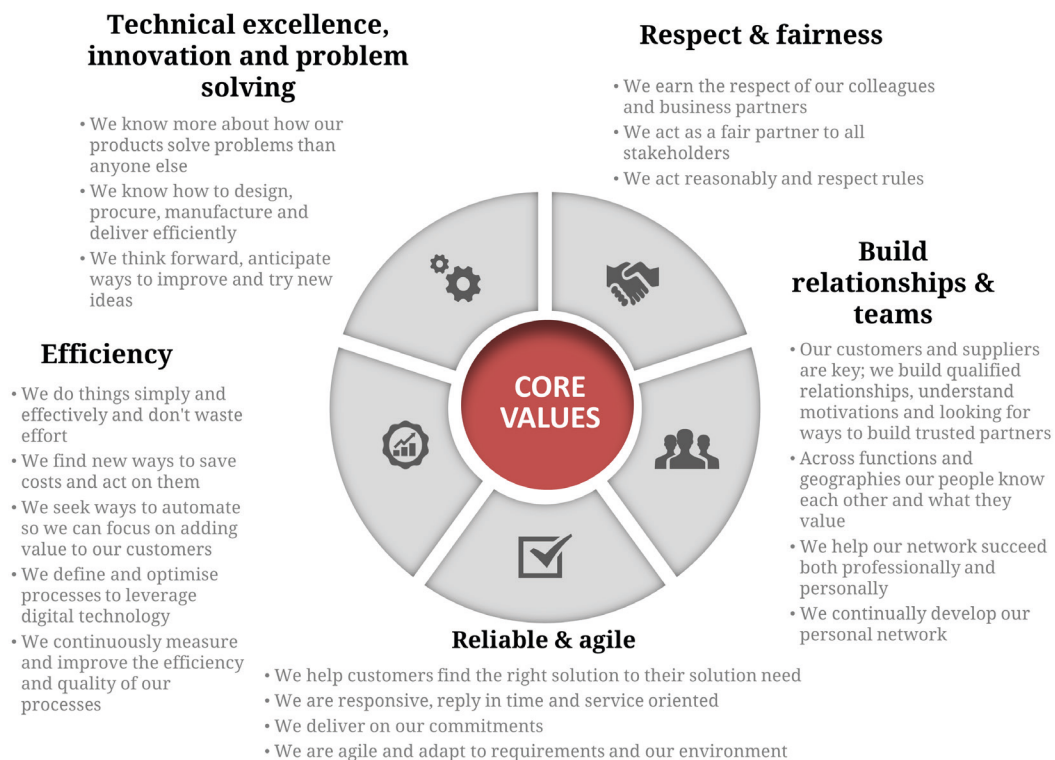
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# 1. Core Values of the Angst+Pfister Group

At the Angst+Pfister Group we constantly develop and transform to better meet our customer's and the market's expectations and needs.

The common theme within this agility is formed by the Angst+Pfister Group values, by having a culture of respect and fairness, building relationships and teams, offering technical excellence, innovation and problem solving through our efficiency.

The Angst+Pfister Group values furthermore constitute the basis and a compass for the principles of this code and thereof for our actions. Following this compass and integrating it into the daily actions allows every member of the Angst+Pfister Group to contribute to a successful and sustainable continuance of our business and hence our journey.



## 2. Compliance with Laws and Regulations

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The Angst+Pfister Group expects its employees and partners to comply with all locally applicable laws, guidelines, and company and staff regulations and to take appropriate action against any illegal or criminal acts or acts in violation of our policies and rules.

## 3. Environment

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Environmental issues are one of the Angst+Pfister Group's main concerns.

Environmental impacts are taken into consideration at all lifecycle stages of our products and services. We promote compliance with international environmental standards, implementation of enhanced environmental assessments, and we expect our suppliers to have a systematic approach towards environmental issues in place.

A conscious and careful use of the resources is one of the main pillars of our processes. We strive to continuously reduce the consumption of resources through optimized business processes.

## 4. Sustainable Supply Chain

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International procurement and a close and trusting cooperation with production partners is an essential part in Angst+Pfister's more than 100-year company history. It repeatedly leads to creative solutions and outstanding innovations in cooperation with our partners.

For this reason, every member of the Angst+Pfister Group must not only comply with local laws and regulations, but also seek business relationships with all partners based on trust and respect. As a leading supplier and solutions partner for industrial components, the Angst+Pfister Group must set standards in the market with our ethical principles. Both our employees and our suppliers are committed to adhere to our defined ethical principles and professional standards.

Our principles for our suppliers are expressed in our Code of Conduct for Supply Partners and suppliers are thoroughly selected based on therein stated principles.



## 5. Information and Data Security

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The Angst+Pfister Group business is based on a disciplined and sensible approach to risk plans for protecting both our company and our business partners.

Confidential information will also be treated as such with the utmost care and discretion. We do not disclose any confidential information unless we are required to do so by law. Our Information Security Management System maximizes data security and minimizes access to sensitive information, including third party information.

### The Angst+Pfister Group property

The Angst+Pfister Group property, including but not limited to physical assets, proprietary information, know-how, patents, trademarks, copyrights, brands, company names, product denominations, must be safeguarded.

All employees are required to use the Angst+Pfister Group property only for legitimate business purposes and to protect it from loss or unauthorized use. The unlawful or improper use, misappropriation or abuse is prohibited. Intangible property, for example unpublished business-related information or business secrets, must be treated as confidential.

Those employees who hold such information must not make it available or accessible to unauthorized persons neither inside nor outside the company. While it is appropriate to gather publicly available information about other companies, the use of illegal, unethical, or otherwise questionable methods to obtain information about other companies is not permitted.

### Our partner's and supplier's property

At the Angst+Pfister Group we protect confidential property of our partners and suppliers in the same manner that we protect the confidentiality of our own. We act compliant with applicable laws and regulations on the collection, transfer, processing, and retention of confidential information and assets. Our suppliers are obliged to do so to ensure for a secure supply chain for all involved parties.



## Personal data

Confidential information of or relating to the Angst+Pfister Group employees, such as personal identification data, employment or education records, banking or financial account information are deemed to be personal and must be safeguarded. We respect and protect this information, just as diligently as confidential company information. Laws dealing with the protection of personal data vary from country to country. We adhere to such laws being in force in the respective region or country where business activities are performed.

The following guideline enables you to reduce the threat of information and data security in your daily working routine:

- Do not send inappropriate emails and always ensure you know who you are sending the email to. In return, do not open emails from untrustworthy sources.
- Do not stream or download unauthorized video or audio files.
- Only download or install software authorized by the Angst+Pfister Group IT. In case of doubt, contact your IT responsible.
- Ensure to always protect your devices with passwords and keep your passwords confidential.
- If working in a public space, i.e. public transport, public hotspot or client's IT network consider all preventive measures to protect confidential data from third parties.
- Digital customer meetings where confidential information is being exchanged, shall be conducted in an environment that ensures the treatment of confidential information as such.

## 6. Records and Accounting

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The Angst+Pfister Group must comply with accounting standards and procedures. All company documents must be filed accurately, truthfully, completely, and in a timely manner and comply with our review and approval procedures.

These records include but are not limited to invoices, expense reports, time sheets, vacation, and over-time registration.

Employees must never create a false or misleading report or request or make a payment for a purpose other than as described by the supporting documents. Employees must never sign someone else's name or sign on behalf of anyone other than themselves, unless authorized to do so.

## 7. Trust and Respect

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The Angst+Pfister Group principles underline the general conditions for a climate of integrity, trust and respect, enhancing teamwork, innovation, customer focus and the long-term success of our company.

The below day-to-day examples demonstrate on how to interact with each other to keep these principles alive:

- We work transparently, share our results and foster the exchange with the involved stakeholders.
- Constructive feedback helps us to improve and learn from each other.
- We communicate in a respectful, open and honest way with our colleagues and customers.

At the Angst+Pfister Group, we foster an environment of inclusion where employees work together in cross-border teams to leverage and develop our culture and capability. We promote diversity to unfold the full potential of our cooperations. Discriminatory comments or conduct against individuals, particularly relating to race, religion, sexual orientation, nationality, ancestry, trade union activities, concerning age, gender or any disability will be brought to account and lead to consequences. We do not tolerate violence in the workplace which includes either direct or indirect threats, threatening behavior, intimidation, physical attack and harassment.

## 8. Health and Safety

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At the Angst+Pfister Group we are fully committed to provide safe working conditions conforming to regulations for occupational health and safety protection. All employees share responsibility for their own health and safety as well as for the one of their colleagues and business partners. It is therefore essential for each individual to respect all safety regulations in the workplace to minimize health risks for all.

The Angst+Pfister Group principles are in accordance with our Human Rights Policy, internationally recognized Human Rights and regional labour law in order to ensure sound working conditions. We reject child labor and any form of forced labor. We respect trade unions and their principal right to form associations. We also respect where applicable worker's council organizations, democratically elected by associates and strive for a constructive cooperation with workers' representatives.

## 9. Anti-Corruption and Bribery

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At the Angst+Pfister Group we obey to all applicable laws and corresponding regulations and do not tolerate bribery or corruption. Gifts or advantages intended to obtain an unlawful advantage or to improperly influence may not be given or offered, directly or indirectly, to public or private function and decision-makers.

Employees of the Angst+Pfister Group may not provide or authorize any funds to any intermediary when any of those funds may be used for corrupt payments to government officials or similar officials of institutions. Invitations to meals as recipient or as an offer to others in a business relationship may, depending on applicable laws and customs, be considered legal and acceptable in the course of business. However, the exchange of excessive or inappropriate gifts and entertainment is unethical, may be illegal and may severely injure your personal and business reputation and that of the Angst+Pfister Group.

Below examples demonstrate but are not limited to lawful behaviour and shall help our employees to act within the legal framework when exchanging inexpensive gifts or entertainment with commercial customers, suppliers and business partners:

- A gift must be of nominal value and cannot consist of money or its equivalents.
- Offering or accepting bribes (including facilitation payments) are strictly forbidden.
- The gift, meal or entertainment is part of a legitimate business relationship or celebration and does not influence or could not reasonably be construed as influencing for both parties in the fulfilment of their responsibilities.
- The exchange of the gift, meal or entertainment does not break any law or violate any generally accepted ethical standard nor cause any concern or embarrassment to the company.

The restrictions outlined above apply equally to gifts, meals or entertainment offered to you or your family and friends by customers, suppliers or competitors and vice versa. If in any doubt, consult your leader or as the last option, the Compliance Helpdesk.

## 10. Conflicts of Interest

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A conflict of interest arises when an employee's private interest interferes or even appears to interfere in any way with interests of the Angst+Pfister Group. Situations where personal interests or those of your family or friends impact your professional judgement, objectivity or loyalty to the Angst+Pfister Group, should be avoided.

Employees are expected to disclose the conflict of interest to their leader. In those situations where a conflict arises, the employee should not be involved in the decision making.

### Examples:

- If a family member applies for a job for which the employee is leader
- When an employee is contracting a supplier who is a close personal friend
- If an employee accepts a (board) position with a competitor or business partner of the Angst+Pfister Group
- If an employee holds a (financial) stake with a business partner of the Angst+Pfister Group
- When a leader is romantically involved with one of her or his direct reports

## 11. Fair Competition

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At the Angst+Pfister Group, compliance with competition laws and fair competition is part of our way to conduct business.

Any participation in cartels, in discussions, agreements or exchange of information with competitors, which lead to unfair competitive advantages, are strictly prohibited.

Robust and fair competition practices include but are not limited to:

- Bidding independently from competitors
- Not discussing bidding practices with competitors
- Not entering into agreements, coordinated practices or understandings that could restrict competition
- Not exchanging sensitive information with competitors including pricing, costs, production data, market data, sales territories, supplier or distribution channels, customer lists or other non-public business information
- No division or allocation of geographic markets, customers or product lines

Each employee is responsible for knowing and understanding applicable competition rules and principles. They are encouraged to consult with their leader or legal point of contact any time guidance is needed. Confidential and competitively sensitive information such as product-, cost- and pricing information or information on future strategies, plans or product roadmaps shall not be shared with competitors.

## Seek Guidance, Report a Concern

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Every employee of the Angst+Pfister Group is responsible to respect the principles and standards described in this Code of Conduct.

If you have questions or are not sure how to deal with a challenging situation, your leader is your first point of contact. Alternatively, you can also consider reaching out to your local HR department. In addition, the Angst+Pfister Group operates a Compliance Helpdesk where you can ask for guidance, but also report concerns about (potential) breaches / violations of our standards and principles.

The Compliance Helpdesk is managed by an independent third party, where you can report concerns or seek guidance. Your message will be dealt with confidentially. If local laws allow, anonymous reporting is also possible.

The hotline can be reached via:  
<https://angst-pfister.compliancehelpdesk.report/>

The Angst+Pfister Group does not accept retaliation against employees who report concerns in good faith. Retaliation against any employee who in good faith reports a concern to the company about illegal or unethical conduct will not be tolerated and will be subject to disciplinary action.



The Compliance Helpdesk:



Angst+Pfister Group

**January 2022**