

komax

# CODE OF CONDUCT

KOMAX GROUP



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## DEAR COLLEAGUES,

In an ever-changing environment, it is particularly important that we adhere to clear and ethical principles throughout our business operations. Our Code of Conduct is much more than a set of rules; it reflects our shared values and beliefs. It serves as a compass for our daily actions and helps us make the right decisions. However, there are situations where it can be difficult to do the ethically right thing. For such cases, you will find six questions on page 4 that can support you in the decision-making process.

**“Our Code of Conduct is much more than a set of rules; it reflects our shared values and beliefs and serves as a compass for our daily actions.”**

Our long-standing success is based on elements such as trust, integrity and respect. The Code of Conduct helps us practice these principles and ensure that we always operate in accordance with the highest ethical standards. It provides guidance and clarity regarding our expectations and commitments, both internally and externally, and helps put our ethical principles into practice.

Our Code of Conduct should encourage us to take responsibility, communicate openly and ask for advice when necessary. We all have a responsibility to uphold and actively promote ethical standards. If we encounter a situation where we have concerns about the integrity of the conduct of the parties involved, we offer a variety of internal and external ways to report this (also anonymously).

Let's work together to create and maintain an environment where honesty, transparency and fairness come first. Your integrity and commitment are critical to our long-term success and reputation as a trustworthy company.

Thank you for your continued commitment and support. Together, we can ensure that our company will remain on a solid ethical foundation and move successfully into the future.

With best regards,



**Beat Kälin**  
President of the  
Board of Directors

**Matijas Meyer**  
CEO

# INTRODUCTION

## Why do we have a Code of Conduct?

The employees of the Komax Group are represented in many countries and bring with them a wide range of cultural perspectives as well as in-depth knowledge in various specialist fields. We appreciate the international composition of our teams and the potential created by our diversity. In spite of all our differences, what unites us is the strong sense of personal integrity in the way we do business and work together.

Our Code of Conduct forms the foundation of our joint and individual commitment to ethical conduct and serves as a practical guide for our employees, suppliers, and business partners, so that we can meet our global business standards. In a world that is constantly changing due to technological progress and global developments, it is essential that we adapt to the complex and

dynamic laws and regulations and always provide our customers with quick and comprehensive solutions. In order to maintain our leading position in this challenging environment, we are committed to the highest standards of integrity, accountability, sustainability, and transparency, as anchored in our Code of Conduct.

## Where does the Code of Conduct apply?

This Code of Conduct applies to all employees, managers, bodies, consultants, independent contractors, temporary workers, agency staff, and other persons working for the Komax Group worldwide. As such, it also applies to all joint ventures or other companies in which the Komax Group holds a majority interest or over which it exercises effective control. We expect our business partners and suppliers to adhere to ethical standards consistent with our Code of Conduct.

## WHEN IN DOUBT, ASK YOURSELF THESE QUESTIONS:

- Is my conduct legal and in accordance with the guidelines of the Komax Group?
- Would I be happy if I were treated the same way?
- Would my friends and family consider my conduct ethical?
- Would I be comfortable with my conduct being reported in the media?
- Can I maintain the trust of our stakeholders with my conduct?
- Am I aware of the impact my conduct has on those affected?

# RULES OF CONDUCT

## LAWS AND REGULATIONS

Unlawful conduct is contrary to the interests of the Komax Group because it is unethical, hurts our company's reputation, and can entail severe penalties.

Wherever we work and carry out business, we comply strictly with the applicable laws and regulations of the country concerned, as well as with international law. These form the framework

for our actions. We also follow internal guidelines and standards, to which we are committed. In addition, we require our business partners and suppliers to comply with the laws and regulations and to acknowledge specific codes of conduct as binding. Anyone who acts unlawfully must be aware that doing so can have legal consequences for the individuals concerned.

**“We comply with all applicable laws and regulations.”**

## WHAT DOES THIS MEAN FOR ME?

- I familiarize myself with the laws and regulations that apply in my area of responsibility.
- If I have any questions or concerns, I contact my managers, Group Legal & Compliance, or Group HR.

# SOCIETY AND THE ENVIRONMENT

## HUMAN RIGHTS

The Komax Group promotes a corporate culture that supports the advancement and observance of human rights. We follow the principles of the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organization's (ILO) core labor standards, and other applicable laws and principles.

We require our employees, suppliers, contractors, and business partners to comply with these or similar standards, as well as those listed here:

- We conduct risk-based due diligence audits to ensure that our suppliers and business partners uphold our commitment to respect human rights, and we do not work with suppliers or business partners that we know to practice forced labor, modern slavery, human trafficking, exploitation, or discrimination of any kind, including of children and vulnerable people.
- We respect the right to freedom of association, collective representation, fair pay, equal treatment, equal opportunities, and a safe and healthy workplace.
- We address complaints and concerns and endeavor to provide appropriate remedies.
- Respect for human dignity can be seen in our daily dealings with our customers and business partners. This includes the promotion of diversity, inclusion, consideration for people with disabilities, and the protection of the rights and dignity of everyone we work with.

**“We respect the dignity of everyone we work with.”**

### WHAT DOES THIS MEAN FOR ME?

- I report any suspicious work practices that come to my attention, e.g., when visiting workplaces, such as the employment of minors and unsafe or unhealthy working conditions.
- Before entering into a business relationship with a supplier or business partner, I will perform due diligence in accordance with the established processes to verify and confirm that the business partner and any relevant projects in which they are involved are not complicit in actual or potential human rights abuses and that they are committed to comparable standards to those of the Komax Group.
- I consider what impact a business relationship, project, product, or service might have on human rights in the intended region, and discuss possible impacts with the responsible managers and experts.
- I regularly monitor business partners' human rights practices. I make human rights part of the ongoing dialog with these partners.
- I pay particular attention to respecting human rights when doing business in countries where the rule of law is insufficient or where the government appears not to be transparent.

## SUSTAINABILITY AND ENVIRONMENT

We comply with all environmental laws and regulations in the countries in which we operate. We also promote sustainable development and are committed to achieving the sustainability goals of the Komax Group by supporting environmental protection, social development, and economic progress, as well as by promoting the sustainable use of resources. It is our ambition to continuously improve in these areas in terms of our products, services, and business. In order to combat climate change, we strive to reduce emissions and waste, use fewer hazardous substances, and save energy and water, to name but a few examples.

We expect our suppliers and business partners around the world to share our commitment to sustainability and the environment.

We constantly consider what the Komax Group can do to reduce the environmental impact of its products and services over their entire life cycle – from design and procurement to logistics, materials, and use, to the reuse or disposal of the products at the end of their service life.

The Komax Group pursues a sustainability business policy to meet its economic, environmental, and social requirements. We expect our employees to be familiar with this policy and its requirements.

**“We pursue a business policy of sustainability to meet our economic, environmental, and social requirements.”**

### WHAT DOES THIS MEAN FOR ME?

- In my work, I ensure compliant, safe, and sustainable environmental practices.
- I discuss ideas to reduce the environmental impact of our products, business, and services with my line managers.

# OUR CONDUCT IN EVERYDAY BUSINESS / BUSINESS ETHICS

## COMMUNICATION

We communicate respectfully, honestly, and transparently. Our business activity is characterized by reliability, trustworthiness, and integrity. We therefore place emphasis on accurate and truthful communication with our employees, customers, business partners, investors, and other stakeholders of the Komax Group. When we exchange or disclose information, we take care to

ensure that it is up-to-date, precise, truthful, and understandable. When communicating internally and externally via all media and channels, we make sure to protect confidential information belonging to the Komax Group and provide comprehensive and accurate information, and always support open discourse and dialog.

**“We communicate with our stakeholders in a respectful, truthful, and understandable manner.”**

### WHAT DOES THIS MEAN FOR ME?

- I communicate in different time zones, languages, and cultures. I am aware of possible time differences, act with consideration, and bear in mind that people speaking a different language may interpret my message differently to how I intended. Before I communicate, I consider whether my statement could be perceived as discriminatory, offensive, harassing, threatening, or defamatory.
- I am familiar with the internal guidelines and regulations of the Komax Group for communication, branding, and social media. If I am not sure whether or not it is allowed to communicate certain content, I consult Group Communication/IR/ESG (communication@komaxgroup.com).
- If I receive a request from the media about the Komax Group, I always refer the person concerned to Group Communication/IR/ESG (communication@komaxgroup.com) or to an authorized company spokesperson. It is important that we as a company speak with a single voice.
- If I make an error in communicating information, I correct it immediately. I make it clear that a correction has been made.
- Inappropriate communication can lead to difficult situations. If I notice risky or inappropriate content on internal or external channels, or if I am not sure whether an item of content is suitable for communication, I contact Group Communication/IR/ESG (communication@komaxgroup.com).

## CONFLICTS OF INTEREST

We are committed to acting in the best interests of the Komax Group. We only use the information and property of the Komax Group for legitimate and appropriate business purposes. We ensure that all decisions we make on behalf of the Komax Group are made independently of personal interests and are not influenced by them.

We immediately disclose all personal or professional interests that could reasonably be perceived as conflicting with the interests of the Komax Group, which could give the appearance of improper conduct, or could influence our judgment in the fulfillment of our duties at the Komax

**“We act in the best interests of the Komax Group and make decisions independently of personal interests.”**

### WHAT DOES THIS MEAN FOR ME?

- I immediately disclose potential and/or actual conflicts of interest, including relationships that could lead to an actual or perceived conflict of interest, to my manager, Group HR, or Group Legal & Compliance.
- If I am not sure whether my personal circumstances constitute an actual, potential, or apparent conflict of interest, it is best to protect myself and the Komax Group by being transparent and disclosing the circumstances as early as possible.

Group. We avoid external obligations and activities that could affect our responsibilities at the Komax Group or damage the company's reputation.

A conflict of interest can be an actual, potential, or perceived conflict – and mitigation may be required in each of these cases:

- Actual conflict of interest: This is the case if there is a direct conflict between your existing personal interests and your current obligations to the Komax Group.
- Potential conflict of interest: This occurs if there are circumstances that may develop into an actual conflict of interest between your existing personal interests and your future obligations to the Komax Group.
- Perceived conflict of interest: When an objective person (such as a work colleague) might think that your personal interests interfere with your judgment and could thus improperly influence your business decisions – whether or not this is actually the case. Even the appearance of a conflict of interest can cause unnecessary difficulties.

Conflicts of interest arise in many situations – for example, if a close relative or friend of yours works for a supplier, customer, or competitor of the Komax Group. In general, financial or personal relationships can lead to conflicts of interest: for example, if a manager oversees an employee with whom they have a close personal relationship, or if someone approves payments or discounts to a distribution channel that belongs to a family member, or engages a supplier under the ownership of a close friend.

The existence of a conflict of interest – or the appearance of a conflict of interest – in itself is not a violation of the Code of Conduct. However, failure to promptly disclose actual or potential conflicts constitutes a violation and may result in disciplinary action.

## FAIR EMPLOYMENT, INCLUSION, AND RESPECT IN THE WORKPLACE

Our employees are the heart of the Komax Group. Our shared values shape our corporate culture and create cohesion across all brands and countries. Together, we are committed to openness and inclusion. We treat all people fairly and respectfully and respect their different points of view.

We offer and promote a healthy work environment. Ensuring health and safety in the workplace is an essential task for us as an employer. In doing so, we identify and control the health and safety risks associated with our work. We encourage and proactively promote health and safety-conscious conduct among our employees.

We are committed to diversity in our company and respect the personal integrity of our employees. The Komax Group promotes diversity in terms of language, origin, ethnicity, culture, beliefs, gender identity and/or gender expression, and sexual orientation. This reflects the diversity in our customer base. We value this diversity as a key factor in our success. We foster an open work environment where everyone can contribute and achieve their full potential. We offer equal employment opportunities, including in terms of recruitment, development, remuneration, and promotion.

The Komax Group prohibits discrimination and inappropriate or illegal actions based on ethnic or national origin, political attitude or ideology, religion, sexual orientation or marital status, gender, genetic identity, age, disability, or any other legally protected status.

We do not tolerate bullying or any other form of verbal, non-verbal, or physical abuse or harassment, whether of a sexual, physical, or psychological nature.

**“We are committed to diversity and do not tolerate discrimination.”**

### WHAT DOES THIS MEAN FOR ME?

To prevent such conduct, we follow the relevant rules and consistently punish violations. Be considerate when interacting with your colleagues and always respect the privacy of others. Specifically:

- I lead by example, treat my colleagues with respect, and act according to our standards for fair treatment, diversity, and inclusion.
- I practice our culture of speaking openly, I do not retaliate against those who express their opinions, and I take a clear stand against conduct that is incompatible with this culture and the values of the Komax Group.

- I do not use offensive language or gestures, including sexual advances, racial slurs, or negative comments about religion, ethnicity, skin color, age, biological sex, gender identity or expression, sexual orientation, political beliefs, citizenship, national origin, language, physical disabilities of any kind, parental status, economic status, veteran status, or social class. I am aware that language, gestures, and images can be discriminatory even if they are meant in jest.
- If I believe I am being discriminated against, harassed, intimidated, or threatened with violence, I immediately raise the matter through one of our reporting channels.

## HEALTH, SAFETY, ENVIRONMENT, AND SECURITY

We are committed to creating a healthy and safe work environment for our employees, supported by a strong learning culture. We are constantly improving our management systems for health, safety, environment, and security (HSE&S) and our implemented workplace standards, which meet or surpass the legal requirements in the countries in which we operate, and we expect our employees, contractors, suppliers, and other business partners to comply with them. Safety is the foundation of our organization and plays a crucial role in our operations, products, and services:

- Hazardous situations or unacceptable health, safety, environmental, or security conditions must never be ignored. Always report such conditions so that corrective and preventive action can be taken.
- The state supervisory authorities take health, safety, environmental, and security issues very seriously. Violations of health, safety, environmental, and security regulations can have serious consequences, including civil or criminal penalties.

**“We provide a healthy, safe work environment and strive to continuously improve it.”**

### WHAT DOES THIS MEAN FOR ME?

- I stop working when it is not safe for me or others to continue.
- I make sure that I understand the task and that I have the necessary qualifications to perform it. I make sure that I use safe working procedures, have all the necessary permits, and use the correct tools and protective equipment for the task at hand.
- I make sure that people in my immediate vicinity know what they are doing so that I can take suitable protective measures.
- I familiarize myself with the Komax Group's standards in the areas of health, safety, environment, and security and always comply with their requirements.
- I address hazardous or environmentally harmful conditions as well as ideas or recommendations to improve health, safety, environmental, and security conditions. This allows us to learn and make corrections and improvements.

## INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Our intellectual property enables us to deliver unique solutions that differentiate us from our competitors and have made us one of the leading companies in our industry. Inventions, innovations, ideas, patents, trademarks, designs, trade secrets, and copyrights are essential in order to develop our products and services and to meet the expectations of our customers. Therefore, we must protect our intellectual property and treat it confidentially. The intellectual property we develop belongs to the company. It is up to us to ensure that we recognize this intellectual property, take suitable measures to protect it, and ensure that it is used exclusively in the interests of the Komax Group and thus also of our customers and partners.

We respect third-party intellectual property. We do not unfairly access information about third parties, nor disclose it without permission.

In addition to intellectual property, the Komax Group holds a wide range of confidential information that is not known or available outside the company. Such information would be of great value to our competitors. This includes technical expertise, R&D data, manufacturing methods, software source code, employee data, business plans and corporate strategies, customer lists, and financial and market data. All this information is vital to our company. We must take suitable measures to protect our confidential information. Such information may only be made available to persons outside the company within the framework of approved business transactions. Confidential information may only be shared, even internally, if there is a need to do so.

**“We protect intellectual property and confidential data.”**

### WHAT DOES THIS MEAN FOR ME?

I think carefully about what information I share, with whom I share it, and for what purpose.

## INFORMATION AND TECHNOLOGY SECURITY

We use (digital) communication channels appropriately. The use of digital communication channels such as email, messaging services, the internet, intranet, and social media can have legal consequences for the company and individual employees. The content of the emails and documents that we create, as well as the data used,

must be appropriate and correct at all times. Communication channels may not be used to gain access to or disseminate illegal, offensive, destructive, or potentially discriminatory content. Communication channels may only be used for business purposes unless stated otherwise.

**“We use (digital) communication channels appropriately.”**

### WHAT DOES THIS MEAN FOR ME?

I am aware that everything I publish on the internet is accessible to the general public. Therefore, I do not publish anything that could embarrass me, the Komax Group, or others.

## DATA PROTECTION AND PERSONAL DATA

We ensure data protection and data security and comply with the relevant data protection regulations.

Data is being processed in new ways as digitalization progresses. Data protection aims to protect the personal data of data subjects from arbitrary handling by third parties or data processing systems, and grants data subjects special protective rights.

Personal data refers to any data that makes a person identifiable, be it directly or indirectly. The processing and other use of personal data is subject to legal regulations. For that reason, personal data may only be used for the intended purpose. In addition, the use of personal data requires the consent of the data subject or a specific legal basis.

We maintain the confidentiality and integrity of data, including the personal data of our employees and customers, by using technical means and organizational measures. We comply with the applicable legal provisions on data protection.

**“We ensure data protection and maintain the confidentiality and integrity of data.”**

### WHAT DOES THIS MEAN FOR ME?

- When handling personal data, I pay attention to the principles of data protection law and familiarize myself with the internal regulations.
- I process personal data exclusively for its intended purpose and with the consent of the data subject or on a specific legal basis.
- If I have any questions or concerns about data protection, I contact the data processing officer or Group Legal & Compliance.

## INSIDER INFORMATION AND INSIDER TRADING

We respect and follow insider trading regulations when buying and selling securities.

Statutory provisions on insider trading prohibit trading in securities on the basis of relevant, non-public information which, if disclosed, could significantly influence the price of the security. It is also prohibited to pass on this type of infor-

mation to third parties. For this reason, persons who have relevant, non-public information (e.g., about large projects or profit forecasts) are prohibited from buying or selling Komax securities.

Non-compliance may result in disciplinary measures and criminal prosecution.

**“We do not use insider information to buy or sell securities and do not share it with others.”**

### WHAT DOES THIS MEAN FOR ME?

If in doubt as to whether the insider trading regulations are applicable or how to interpret them, I consult with Investor Relations or Group Legal & Compliance employees.



## COMBATING BRIBERY AND CORRUPTION; SPONSORING

We condemn all forms of bribery and corruption.

Employees are never allowed to offer or promise, directly or through intermediaries, any personal or improper financial or other advantages in order to establish or maintain a business relationship or other advantages with a third party (whether public or private). Such advantages must never be accepted in return for preferential treatment from third parties either. Employees must also refrain from any activity or conduct that could give the appearance of such conduct or attempted conduct.

Employees may not be influenced by accepting favors, nor are they permitted to influence others by offering favors. Employees may only accept hospitality within customary limits and symbolic gifts appropriate to the situation. You are not allowed to accept or offer any gifts, hospitality, or invitations if they could give the impression that they are intended to have an inappropriate influence on the business relationship in question.

Employees must be aware that offering or granting disproportionate benefits to influence a decision by the recipient may not only result in disciplinary action, but also in criminal prosecution. An improper benefit can be anything of value to the recipient, including employment or consultancy contracts for the benefit of close relatives.

As a responsible company, we make various positive contributions to society in the individual areas in which we operate. These may include appropriate charitable donations and sponsorship activities. As a matter of principle, we do not make donations to political parties, political organizations, or to individuals who hold political office or who are standing as candidates for political office.

**“We condemn all forms of bribery and corruption.”**

### WHAT DOES THIS MEAN FOR ME?

Regardless of the amount, I do not accept any form of monetary gifts and do not offer any myself. Gifts in kind or invitations are only permitted if they do not exceed the limits of that which is customary in business and do not result in an impermissible advantage.

## BOOKKEEPING, ACCOUNTING, AND MONEY LAUNDERING PREVENTION

We document and report our finances, transactions, and assets correctly. We comply with the laws that apply to our financial records, accounting standards, tax obligations, and financial disclosure obligations. We have a strict zero-tolerance policy with respect to fraud or other misleading conduct in connection with our record-keeping and reporting duties.

Money laundering is the practice of concealing the proceeds of criminal activities through legitimate business transactions or using legitimate funds to support criminal activities. We strictly follow the laws that prohibit such practices and watch out for suspicious financial transactions aimed at disguising the true origin of funds or individuals' identities.

We protect the property, assets, and data of the Komax Group from improper or unauthorized use and take care to prevent loss, theft, or damage. We use Komax Group assets exclusively for legitimate business purposes.

**“We strictly follow laws and guidelines on correct financial reporting and the prevention of fraud and money laundering.”**

### WHAT DOES THIS MEAN FOR ME?

- I make sure that all business transactions are fully and properly documented in accordance with the accounting standards and internal rules of the Komax Group as well as the applicable laws.
- I do not sign any authorizations or other documents without first verifying their accuracy and ensuring that the transactions they are based on serve a legitimate business purpose of the Komax Group.
- I do not alter or destroy any documents that I have been instructed to keep or am required to keep within the framework of the retention periods at Komax Group.
- I am vigilant and report suspicious transactions immediately to my line manager, Group Finance, or Group Legal & Compliance.

## FAIR COMPETITION AND ANTITRUST LAW

Free competition is very important to us. Our competitive behavior is fair, open, and independent.

The Komax Group is prepared to successfully compete with other companies in full compliance with applicable antitrust and competition laws and principles of fair business conduct, without fail. All employees must follow the following rules at all times:

- Business policies and prices are set independently and are never formally or informally arranged with competitors or other independent parties, be it directly or indirectly.
- Customers, territories, and product markets are never divided between the Komax Group and competitors, but are always acquired as the result of fair competition.
- Customers and suppliers are treated fairly.

**“We value free competition, act fairly, and fully comply with antitrust and competition laws.”**

### WHAT DOES THIS MEAN FOR ME?

- I am personally responsible for being familiar with the applicable competition laws, especially if I am involved in marketing, sales, or purchasing, or if I interact regularly with competitors.
- If in doubt, I contact Group Legal & Compliance for advice, or for training if necessary.

## GLOBAL TRADE

We comply with applicable trade laws and regulations, including import and export control regulations, trade sanctions, and customs procedures, and we expect the same from our business partners.

The Komax Group has strict policies, procedures, and controls to minimize risks associated with global trade in goods, technologies, and services as well as money transfers, including appropriate auditing of transactions that could affect embargo and sanctioned countries, procedures to simplify compliance with relevant laws in this area, and systems and training to ensure correct declaration to the trade authorities.

**“We rely on strict policies and controls to minimize risks in global trade.”**

### WHAT DOES THIS MEAN FOR ME?

- I comply with the laws of the countries involved and the requirements set out in the Komax Group’s Global Trade Compliance Procedure whenever I import or export tangible or intangible goods. Even transactions that are only occasional or minor (low volume, low price range, or even the transport of free spare parts and/or goods for service) are subject to trade regulations.
- Import and export documents must be duly completed, checked for accuracy, and prepared in accordance with the Global Trade Compliance Procedure of the Komax Group.
- I do not export or transfer any controlled goods (be it directly or indirectly) without having the necessary export license or without meeting the conditions of the relevant licensing regulations.
- I do not engage in any transaction involving a sanctioned country, a blacklisted contractual partner, or an unauthorized end use (e.g., military applications, such as weapons) – or which I suspect of such – without following the requirements set out in the Komax Group’s Global Trade Compliance Procedure and seeking the advice of a Trade Compliance Officer.
- I make sure at all times that I am aware of all elements of a transaction (parties, products, end use, and destination country) and that I comply with all applicable laws and regulations as well as the Global Trade Compliance Procedure of the Komax Group. If I have any questions or anything to report, I contact Global Trade Compliance ([tradecompliance@komaxgroup.com](mailto:tradecompliance@komaxgroup.com)).

## COOPERATION WITH SUPPLIERS

We only work with suppliers who share our commitment to integrity, sustainability, and human rights and who have agreed to meet the requirements set out in our Supplier Code of Conduct. We follow the procurement standards and procedures of the Komax Group when qualifying, commissioning, and managing our suppliers. The Komax Group is committed to a transparent and competitive procurement process and fair and responsible treatment of our suppliers:

**“We treat our suppliers responsibly and only work with those who are willing to comply with our defined principles of conduct.”**

- We expect our suppliers to comply with labor rights and standards at their facilities, as well as the applicable human rights legislation, including laws prohibiting child and forced labor, modern slavery, and human trafficking.
- Suppliers are obliged to provide their employees with a safe and healthy workplace and to conduct their business in an environmentally sustainable manner.
- Suppliers are obliged to refrain from any form of corruption, extortion, or bribery.
- Suppliers are also obliged to apply the aforementioned standards in their own supply chain and to rectify any violations at their own facilities.
- We do not tolerate suppliers who have questionable ethical conduct or who violate the Komax Group Supplier Code of Conduct. Ethical violations may not be left unaddressed, ignored, or downplayed when assessing the performance of suppliers.

## WHAT DOES THIS MEAN FOR ME?

- Purchases of goods and services must always be made in accordance with our procurement policies and procedures, as well as a risk-based review and integrity monitoring.
- I immediately notify my manager of any health, environmental, or safety concerns, as well as any human rights violations or matters related to forced, slave, or child labor. I always follow the reporting procedures of the Komax Group to ensure that we act in a timely and appropriate manner.
- I do not favor or treat any person or company on the basis of any criteria other than the best interests of the Komax Group. I do not allow conflict with personal or family interests to influence my business activities for the company.
- I make sure that the suppliers under my supervision or with whom I otherwise work take immediate and effective corrective action in the event of defects identified during site visits, audits, and other inspections.

# REPORTING INTEGRITY CONCERNS

**“We offer a wide range of internal and external ways to report concerns (anonymously) – see [komaxgroup.com/integrity](https://komaxgroup.com/integrity).”**

## CONTACT PERSONS FOR CONCERNS

- Line managers
- Human Resources Business Partner
- Group Legal & Compliance
- External reporting office of the Komax Group
- CEO
- Board of Directors

If an anonymous report is made, sufficient details and facts must be provided for the report to be investigated effectively.

## Obligation to protect against retaliation by the Komax Group

The Komax Group strives for a culture in which all concerns regarding potential violations of the Code of Conduct can be raised freely and in good faith, without fear of retaliation or other adverse action. Retaliation includes any adverse employment action such as termination, suspension, demotion, or refusal of overtime, promotion, or benefits, or disregard in employment decisions, negative impact on work conditions, or the creation of a hostile or intimidating work environment.

## What happens when a concern is raised?

The Komax Group takes every concern seriously and handles allegations with the necessary confidentiality. The reporting office will confirm receipt of your request and examine it carefully so that appropriate further action can be taken without delay. All employees and contractors of the Komax Group are obliged to cooperate fully when reviewing integrity concerns and to provide complete and truthful information. We will not tolerate any acts of retaliation. If necessary, the company will initiate temporary remedial actions during an ongoing investigation. If the concerns are found to be justified after the investigation is completed, decisions will be made on further remedial or disciplinary action.

**“We strive for a corporate culture where concerns can be raised without fear of retaliation.”**

### Corrective and disciplinary actions

Having a corporate culture in which concerns can be reported without fear of retaliation makes a major contribution to the competitiveness of the Komax Group. It provides an opportunity to address potential issues or ineffective processes and controls early on, before they can develop into larger or more comprehensive issues. If the investigation of the matter identifies a need for improvement in processes or controls, the relevant business unit is required to implement necessary and systematic corrective actions to prevent the problem from reoccurring. In other cases, disciplinary action against individual employees may be called for, up to and including termination of employment. The extent of the disciplinary action depends on several factors determined by the relevant Komax Group rules and regulations, including but not limited to:

- Activity level and rank of the employee.
- Whether the employee acted with willful intent.
- Whether the employee has caused a legal or financial risk to the Komax Group.
- Whether the employee fully cooperated with the investigation and provided comprehensive and truthful information.
- Whether the employee acted dishonestly, fraudulently, or for their own benefit.
- Whether the employee's actions constituted a repeated or systematic violation.
- The potential or actual impact of the employee's conduct on the corporate culture and reputation of the Komax Group and on the experience of others at the Komax Group.

Managers must maintain a higher standard and can be held accountable for the misconduct of others if they have failed to create or maintain the expected culture of integrity. Group Legal & Compliance together with Group HR summarize cases in anonymized form for training purposes once the relevant internal investigations are concluded, and communicate these internally in order to convey the findings to employees and give them the opportunity to learn from them.

**“We are committed to taking necessary corrective actions if investigations reveal a need for improvement.”**

# YOUR RESPONSIBILITY

We expect all employees of the Komax Group to read and understand the Komax Group Code of Conduct. Beyond that, all employees must:

- Know how and where to report an integrity problem.
- Report any suspected violations of the Code without delay.
- Never retaliate against anyone who participates in an integrity investigation or who raises integrity concerns in good faith.
- Be honest and fully cooperate when asked to participate in an integrity investigation.
- Participate in integrity training courses in a timely manner.
- Understand and be aware of the risks that exist in their company.

The Code of Conduct expects all employees of the Komax Group to adhere to high ethical standards in their business conduct. Each of us is responsible for our own integrity and must never jeopardize the ethical standards of the Komax Group.

Group HR and Group Legal & Compliance are at your side to support you in fulfilling your responsibilities at the Komax Group.

**“We maintain high ethical standards in our business operations.”**

**Komax Holding AG**

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