

CODE OF CONDUCT

OUR
VALUES
OUR CONDUCT

komax

OUR VALUES

Dear colleagues,

Our reputation plays a key role in the long-term success of our company. This is why it is vital that we act with integrity at all times and that the relationships we have with our customers, suppliers, employees, investors and partners are based on trust. With our new Code of Conduct, we have a valuable guide that we can use in our day-to-day work.

The Code of Conduct is built on the ethical principles we have been applying for many years. In addition, it encompasses the five core values – **innovation, customer focus, success, quality and responsibility** – that are a major component of our identity. These values help us achieve a common understanding and – in specific situations – ensure uniform conduct, across all hierarchical levels and functions. It follows, then, that we can and must bring to each other's attention situations where the conduct of individuals does not comply with our company's values. All employees are required to act as role models and to "live" and adhere to the values and rules of conduct. You, therefore, make a decisive contribution to anchoring our values in the everyday fabric of our company.

All employees of the Komax Group are bound by our values and Code of Conduct. All members of staff are being issued with a printed copy and, by signing the requisite document, commit to adhering to the rules of conduct at all times. This means that, in various situations, there are certain questions you will often be called upon to ask yourself. Such as: Is what I am doing in line with the Code of Conduct? Are my actions appropriate and can I take responsibility for their consequences? Is the decision I am making in the long-term interests of the Komax Group?

You may well encounter challenges that are not set out in the Code of Conduct. In such an event, apply your own judgement and consult with your line manager and colleagues.

Thank you for your commitment to our values and for upholding our rules of conduct in your day-to-day work. We look forward to writing the next chapter in our company's success story together with you.

The Board of Directors and Executive Committee of the Komax Group

Dierikon, November 2018

1 INNOVATION

As a pioneering and visionary company, we ensure that our business activity has a long-term focus. We are always open to new ideas and regularly re-examine our approach. This includes looking beyond our immediate concerns. We are willing to take risks – on the basis of knowledge and understanding – in order to reinforce our leadership in terms of innovation. Following new paths can lead to mistakes. We realize and tolerate this because it gives us an opportunity to become even better. We are increasing our lead by continuing to press ahead with innovations proactively, quickly, and determinedly while remaining committed to our usual high quality standards.

2 CUSTOMER FOCUS

The varying needs of our customers are at the center of our activities. We listen to them carefully and ask the right questions. Understanding their requirements enables us to keep on improving. We strive to ensure that our solutions offer our customers added value, so that they can increase their efficiency and productivity and thus gain a competitive advantage. We are close to our customers, communicate actively, and foster friendly, long-term relationships and partnerships based on respect and esteem.

3 SUCCESS

We pursue ambitious targets and make an effort to achieve them every day. As a market and technology leader we make high demands of ourselves and strive to find the best solution for our customers. Our long history of success encourages us to continue the success story and create sustainable value. This benefits our customers, employees, and investors. We want all these stakeholders to share equally in our success. We nurture competent, committed employees who enable us to retain loyal, satisfied customers.

4 QUALITY

Our day-to-day work is driven by quality and a willingness to examine what we do critically. We provide our customers with solutions that fully meet our quality requirements and supply what we have agreed. This commitment lies at the heart of our long-term, trusting customer relationships. Our efforts to keep on getting better include always delivering the agreed quality and actively asking customers how we can improve further. It is clear to us that this creates trust, which is of inestimable value.

5 RESPONSIBILITY

We take our responsibility towards our customers, employees, and investors seriously and act as a reliable, trustworthy partner. Our integrity and ability to keep to our agreements and meet our deadlines make us stand out from the crowd. We keep our word and ensure that our partners and colleagues do so too. A strong sense of shared responsibility is important to us and we are careful to foster it. We take responsibility for our actions, make decisions, and carry them out. If we pass our responsibility on to others, we do so deliberately and ensure that they assume it in turn.

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Laws and regulations

Wherever we work and carry out business, we comply strictly with the laws and regulations of the country concerned. 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 to comply with the laws and regulations and to acknowledge our specific code of conduct for business partners as binding.

Bribery and corruption

Our business activities are based on the quality of our services and on integrity. We therefore firmly reject any form of bribery or other type of corruption. We do not accept or offer any monetary gifts, regardless of the amount. Gifts in kind and invitations are allowed only if they do not exceed the customary limits usual in business and do not provide us with any improper advantage.

Donations and sponsorship

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

Conflicts of interest

We avoid conflicts between our personal interests and those of the Komax Group. In our day-to-day work, we place the interests of our customers and the Komax Group above our own. We disclose at work any situations that cause potential or actual conflicts of interest. If a particular conflict of interest cannot be avoided, we take appropriate action promptly and make this transparent so that the Komax Group is not disadvantaged by it.

CODE OF CONDUCT

Confidential information / data protection

Confidential information (including strategic, technical, financial and product-related or personal data) is not intended for third parties. We therefore handle it carefully and protect it in accordance with local data protection laws. This also applies to confidential information entrusted to us by third parties. We do not use any confidential price-sensitive information for securities trading purposes and do not pass such insider information on to third parties.

Communications

Our business activity is characterized by reliability, trustworthiness and integrity. We therefore place emphasis on accurate, truthful and transparent 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, truthful and understandable.

Protection of property

We use the property of the Komax Group appropriately and carefully and do not misuse it for personal ends. Our intellectual property (including patents) is a competitive advantage for us. We therefore protect it in the same way as our material assets. We respect the intellectual property rights of our competitors and of third parties.

Equal opportunities

Treating one another with fairness, appreciation and respect is part of the Komax culture. This includes respecting human dignity and human rights and protecting the rights of our individual colleagues. We promote equal opportunities and do not discriminate against anyone on the grounds of gender, skin colour, ethnic origin, nationality, age, sexual orientation, religious affiliation, disability, political views or philosophy. We do not tolerate sexual harassment, threats, intimidation, verbal or physical violence or bullying in the workplace.

Health and safety

We give top priority to health and safety at work. We create a safe, healthy working environment by undertaking to comply strictly with regulations and safety standards. When we become aware of shortcomings or breaches, we report these to our line manager immediately so that appropriate action can be taken.

Sustainability

We strive to develop our business sustainably and refuse to seek profits at the expense of the environment. We systematically comply with environmental laws and regulations, and when possible we exceed the minimum requirements as regards environmental protection. We are committed to environmentally friendly production methods and use natural resources responsibly.

Breaches

Breaches of the Code of Conduct are not tolerated anywhere in the Komax Group and will result in appropriate consequences for offending employees. This applies both to those who have broken the rules and all those who knew about the breaches but failed to report them. Striving for advantage – both for personal purposes and on behalf of the Komax Group – does not at any time justify illegal or unethical business practices.

When we become aware of a breach, we report this immediately to our direct line manager. If there is a possibility that the line manager is involved in the

improper behaviour or knows of it, we contact the next most senior line manager or the local HR department. Alternatively, we can contact our independent external whistleblowing service (codeofconduct@ssrlaw.ch). Such notifications are always treated in confidence. We do not tolerate any reprisals against employees who report breaches of the Code of Conduct in good faith.

Questions regarding the Code of Conduct

Questions regarding the Code of Conduct and its application may be addressed to the Vice President Global Human Resources or to the local HR department.

DECLARATION

By signing, I confirm that I have received and read the Code of Conduct.

First name / Last name

Employer / Department

Signature

Date

Please return this declaration to your local HR department.

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