

Code of Conduct

August 18, 2023

Purpose of the Code of Conduct

The Code of Conduct sets out guidelines for the worldwide activities of all employees¹ of Arbonia AG and its group companies ("Arbonia" in the following).

Principle

Arbonia is aware of its economic, environmental and social responsibility towards their capital providers, employees, customers, business partners, the state, society, and the environment. It holds the strong belief that ethical conduct is indispensable for successful operating activities over the long term. Arbonia lives up to this responsibility by demonstrating ethical conduct in every one of its operating activities.

Engagement, responsibility, trust and cooperation are values that Arbonia and its employees have taken to heart. Applying and implementing these values in daily contact with internal and external partners is part of the corporate culture practised at Arbonia, which is based on mutual respect.

Integrity in operating activities

Compliance with laws

Compliance with the applicable laws in all countries in which Arbonia is active as well as compliance with the relevant international standards and the stock exchange regulations of the SIX Swiss Exchange are a matter of course.

Corporate governance

An effective corporate governance is essential for sustainable and successful operating activities. Arbonia ensures up-to-date corporate governance practices, which it regularly reviews and adapts when necessary.

Trusting cooperation with business partners

Arbonia maintains a continuous partnership with customers and suppliers that is based on openness and mutual trust. Arbonia expects sustainability, social responsibility, as well as compliance with laws and standards from its suppliers.

Fair competition

Arbonia is committed to fair competition based on performance. Arbonia neither engages in prohibited competitive practices nor does it participate in agreements that violate cartel law.

¹ Within the meaning of the Code of Conduct, employees also include members of governing bodies. When this text refers to employees, it means all sexes. This also applies to other terms.

Bribery and acceptance of benefits

Arbonia does not tolerate either active or passive bribery. Arbonia does not grant any unjustified benefits to government or authority officials or to employees of private or public enterprises to influence their decisions nor does it accept such benefits from third parties. No-one who works for Arbonia may give, request, or accept improper benefits such as excessive gifts or services, i.e., those whose value exceeds a customary level. Giving of gifts or services is also to be refrained from especially when they would improperly influence business decisions or even merely create such an impression. All donations made by Arbonia must be transparent.

Conflicts of interest

Arbonia strives to avoid conflicts of interest for management and employees wherever possible. All employees are expected to act in the best interests of Arbonia and to set aside personal interests or benefits. All employees are obliged to completely disclose personal or financial interests that could significantly conflict with those of Arbonia.

Insider dealing

Insider dealing is impermissible and damages the enterprise and its shareholders. Employees are prohibited from using insider information to their own advantage or to pass it on to the advantage of another person.

Information policy

Conscious of its economic, ecological and social responsibility, Arbonia pursues an open and transparent information policy towards all stakeholders.

Confidentiality and data protection

Arbonia protects its confidential information as well as personal data and prevents its improper or unauthorised disclosure. Employees of Arbonia may not internally or externally pass on or use manufacturing and business secrets of Arbonia during or after their working relationship. When cooperating with external partners, a suitable confidentiality agreement must be concluded in advance.

Intellectual property

Arbonia protects its own intellectual property and also respects the applicable rights of the intellectual property of third parties. Arbonia expects its employees to enforce and protect Arbonia's intellectual property rights and to use them in a responsible manner.

Product safety

Arbonia has dedicated itself to the quality and safety of its products. Arbonia guarantees that customers can trust Arbonia products due to their reliability, quality, and performance. All products of Arbonia must comply with the legally established national and international standards as well as the internal quality assurance guidelines.

Responsibility to capital providers

Reasonable returns

Arbonia is aware of its responsibility to private and institutional capital providers. It strives to give its capital providers a reasonable return on their invested capital and an adequate remuneration for the risk taken. However, Arbonia does not base its decisions on short-term profit prospects but on the long-term, sustainable well-being of the enterprise.

Responsibility to employees

Respectful cooperation

The engagement of employees and the possibility of developing their skills is essential for the long-term development of Arbonia. For this reason, Arbonia pays particular attention to ensuring that employees in all countries work together respectfully, fairly, politely, honestly and trustfully.

Employee development

Arbonia places great value on creating an attractive work environment. This includes providing modern workplaces, job-specific training, and continuing education offers as well as individual support and career planning.

Ban on discrimination

Equal opportunity is a core value for Arbonia. Arbonia evaluates its employees according to their performance, their abilities, and their behaviour. Arbonia does not tolerate any discrimination or harassment, whether on the basis of sex, race, religion, national origin, age, handicap, sexual preference, marital status, or other legally protected characteristics.

Health and occupational safety

Arbonia promotes the physical and mental well-being of all employees. They have the right to working conditions that ensure their health and safety.

Labour relations

Arbonia respects the promotion of dialogue between employees and Arbonia and is committed to active labour relations with employees and their representatives.

Responsibility towards society

Dialogue with society

Arbonia recognises the importance of cooperation with authorities and associations for ensuring the prosperity of the enterprise and implementing its business ethics. It strives for a continuing dialogue with representatives of authorities and associations.

Human rights and child labour

Arbonia is aware of the responsibility that global business activities entail in regard to observing human rights and in particular the problem of child labour. In all countries in which it operates, it adheres to the Universal Declaration on Human Rights of the United Nations, the UN Convention on the Elimination of All Forms of Discrimination against Women, the UN Convention on the Rights of the Child, and other international standards for protecting human rights.

Responsibility towards the environment

Environmental protection standards

Arbonia is aware of the ecological effects of its business activities. It complies with local and international environmental protection standards and strives to continuously improve its environmental impact.

Careful use of resources

Arbonia designs all of its activities – from procurement to production to disposal – to maximise the conservation of resources and minimise harmful emissions. Arbonia's products and solutions help people to be economically and environmentally responsible about their impact on the environment.

Responsibility and implementation

This Code of Conduct is binding for all employees of Arbonia. Each individual is responsible for observing and implementing the individual provisions. Superiors are role models and exemplify the Code of Conduct through their own behaviour. They ensure that the Code of Conduct is communicated to all employees and is internalised and implemented by the employees.

Arbonia has further defined this Code of Conduct in internal directives and regulations. It monitors the compliance with the Code of Conduct, directives, and regulations and adapts them as necessary.

All employees of Arbonia are called upon to report violations of the Code of Conduct as well as violations of directives and internal regulations that further define the Code of Conduct, of which they become aware. When assessing whether a specific conduct could constitute a violation of the Code of Conduct, employees must follow reasonable ethical and moral standards and be guided by common sense. Country-specific customs and practices must also be taken into account. There are no discretionary powers in the case of legal violations.

Internal reporting offices are available for reports of this kind. Employees of group companies based in an EU country can also contact the state reporting office(s) designated by the respective EU country. Employees who report breaches in good faith will enjoy the full support of Arbonia and need not fear any negative consequences. Abusive reports will not be acted upon and may result in disciplinary action.

Disciplinary consequences are to be expected for violations of this Code of Conduct. In addition, violations of the law can also result in criminal and civil consequences for employees, such as claims for recourse and damages.

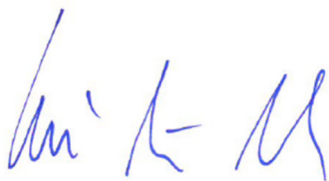
Help and contact persons

Arbonia encourages all employees who are uncertain about the application of the Code of Conduct or about directives or internal regulations that put it into practice to seek advice from their superior, managing director, CEO of the respective division, divisional compliance officer, or the Head of Compliance.

Arbon, August 18, 2023

Arbonia AG

The executive Chairman of the Board of Directors



Alexander von Witzleben

The Secretary of the Board of Directors



Andrea Wickart