



# Code of Conduct SERTO Group

Called SERTO in the document

---

## Introduction

As a company with Swiss roots and active worldwide, we are governed by a variety of laws, framework conditions and sources of influence. Integrity, professional conduct and an excellent reputation are essential competitive advantages in which we at SERTO place particular importance. This Code of Conduct forms the basis of our daily actions and how we interact with each other and with our business partners. Its aim is not to parrot any laws but to address central topics that are crucial to SERTO's economic success.

We obviously expect that all employees – regardless of their position – will abide by all applicable laws and regulations, even if the latter are not explicitly mentioned in this Code of Conduct. The Code constitutes the foundation for trust and honesty in our relations with our business partners.

This Code is complemented by internal guidelines such as the Operating Regulations and the Management Handbook. The Code of Conduct does not introduce any new provisions; instead, it collates a number of principles that have already been applied at SERTO for a while.

We would like to thank all employees for their commitment to preserving these values and thus to contributing to our long-term success.

Frauenfeld, 01/01/2025

## Management SERTO

Norbert Kern  
CEO

Frederik Hombach  
COO

Sabrina Eichmann  
CFO

Marc Veraguth  
CIO

## Fundamentals

SERTO's business relationships with its partners, customers and suppliers (referred to in short as its 'business partners') are based on mutual trust and openness. This Code of Conduct sets out binding guidelines for the behaviour of the board of directors, the company management, executives and employees, as well as for our business partners. Company ethics, corporate governance and environmentally conscious behaviour are very important for SERTO and form the basis of the responsible way we do business.

This reflects SERTO's company philosophy, which is founded on innovation, first-class product and service quality, flexibility and proximity to the customer and thereby guarantees the company's long-term success.

The Code of Conduct documents SERTO's values and principles and serves as a message to all stakeholders. It forms a basis on which business partners, employees and competitors can act correctly, fairly and in compliance with the law at any time without the fear of suffering a disadvantage.

SERTO, including its company management and its executives at all levels, undertakes to exemplify integrity in the course of its daily business and to ensure that this Code of Conduct is implemented and observed.

This Code applies to all employees at all SERTO locations and forms the basis for collaboration with business partners.

## Basic principles

### 1. Observance of the law, and avoiding corruption and bribery

All employees must obey the applicable laws of the country in which they are based. Internal stipulations, regulations and instructions must also be observed.

### 2. Employees/human rights/child labour

SERTO respects its employees' human rights and is committed to safe, pleasant working conditions. Discrimination based on skin colour, origin, gender, sexual orientation, age, religion or membership of unions or political parties is strictly prohibited. Junior employees must meet the statutory minimum age for the country in which they work. Child labour is not tolerated.

SERTO furthermore adheres to ILO Convention 138 (Declaration of the International Labour Organisation on Fundamental Labour Rights) and to all relevant national legislation and provisions.

### 3. Corruption and bribery

No types of corruption such as bribery, kick-backs, offering or accepting advantages or unethical business practices will be tolerated, regardless of the legal system. SERTO expects that any suspicion of such practices will be notified immediately to the person in charge, the management or a duly authorised person of trust. See also Chapter 16 in this regard.

#### 4. Gifts and invitations

Gifts and invitations that place an obligation of reciprocation on the recipient may not be accepted. Extravagant gifts or advantages granted to employees or persons close to them must also be refused. Accepting or offering cash gifts is forbidden as a matter of principle. Gratuities, invitations or hospitality for customers and suppliers within normal business limits are permitted. The financial value of the aforementioned is to be determined in accordance with local customs. If a gift exceeds the customary local value and cannot be returned by reason of cultural practices or the customs of the country in question, the employee may, exceptionally, accept it. Once management has been informed without delay of such a gift, they will decide on what is to be done with it. The giver of the gift must be referred to this regulation.

#### 5. Donations

SERTO views itself as an active member of society with strong social values. Donations and other forms of social commitment are always entered into voluntarily and without any obligation on the recipient.

#### 6. Data protection, confidentiality and trade secrets

The privacy of employees and business partners will be protected at all times. Exclusively data that are required for day-to-day business will be collected and processed. These data will be protected and secured in accordance with the corresponding international and national data protection law. SERTO will never transfer any personal data to third parties outside of the company without permission. Confidential internal company information, such as technical product data, internal purchasing price lists, unpublished financial data and general business secrets are protected to the same extent and do not belong in the hands of third parties. Access to customers' technical data received by SERTO as part of projects is restricted to those employees requiring access for business or legal reasons. Needless to say, this data is also protected and secured in its entirety. IT security promotes the protection of all data from access by unauthorised third parties, data theft or the effects of malware. Various security precautions are taken in this regard, such as up-to-date antivirus software, access concepts and passwords.

#### 7. Fair competition

Fair competition is important to SERTO. Provisions and laws to safeguard fair competition are observed at all times. In particular, no arrangements concerning prices, territory distribution or similar issues and no exchanges of information with competitive content are made. SERTO products are renowned for their quality and no falsified statements are provided or published on product characteristics or services.

#### 8. Export Control

SERTO is an internationally active company that in its business activities observes regulations that govern and may restrict the free exchange of goods. Various national and international laws, product-related regulations and personal and country-related sanctions limit or forbid the import and export of certain goods, services, technologies and financial transactions. SERTO follows all legally relevant export control regulations.

#### 9. Suppliers

When selecting new suppliers or assessing existing supplier relationships, the observance of social, ethical and environmentally conscious behavioural norms is as important as the economic factors. In this regard, SERTO expects of all business partners that they acknowledge and observe the full scope of all relevant laws, the ban on corruption and bribery, human and labour rights and any environmental regulations.

## 10. Environmental protection and energy consumption

SERTO is committed to conserving natural resources. All divisions of the company, and in particular Production, Administration and Facility Management have the objective of operating in a sustainable manner and economising the use of resources including energy. Furthermore, the electricity we use on our production sites has been produced in a sustainable manner that is either purchased, or produced via our own photovoltaic systems. We also place great value on recycling and disposal of material in an environmentally friendly manner. Operating and auxiliary equipment, raw materials and commodities are regularly checked and are, if possible, replaced by products which have a better environmental balance. All of our employees are encouraged to deal with resources such as paper, water, electricity and so on in a responsible manner. SERTO would like to continually improve our own environmental footprint and, among other things, we are implementing an environmental management system in accordance with ISO 14001.

## 11. Fair hiring conditions

SERTO is committed to equal chances, equal status and fair hiring conditions at all its locations. Any form of child labour or forced labour is strictly prohibited. SERTO employees are assessed based on their professional aptitudes and not on the basis of any personal characteristics, conditions or faith. SERTO will not tolerate any form of harassment or discrimination based on race, gender, religion or membership of trade unions or political parties, family status, pregnancy, ancestry or social origin, disability or sexual orientation. Behaviour (including gestures, words and physical contact) that is sexual, coercive, threatening, abusive or exploitative is also not tolerated. SERTO pays its employees salaries and benefits corresponding to the relevant statutory or pay scale provisions and that cover their cost of living. Wage reductions as a disciplinary measure are strictly prohibited. Working hours correspond to the permitted working hours under the relevant national legislation. With the exception of voluntary holiday jobs and in consideration of the specific protective measures for minors, young people are not employed. SERTO's management style is based on the principle of supporting and challenging our employees.

## 12. Conflicts of interest

SERTO expects of its employees that they will always act loyally and in the interests of the company. Personal or family connections or interests may cause conflicts. Employees are therefore encouraged either to avoid such situations or to have a meeting with their direct line manager to find a solution that is acceptable to all sides.

## 13. Occupational safety and health protection

Safety in the workplace and the health of employees contribute to SERTO's economic success. Accordingly, the requisite measures are taken to prevent accidents and avoid health hazards. There are general internal guidelines on occupational health and safety that must be observed at all times. Any accidents or near-accidents must be reported to your superior immediately.

## 14. Incorporating the supply chain and trading partners

SERTO employees must ensure that other stakeholders like suppliers and trading and development partners (business partners) comply with this SERTO Code of Conduct and implement it actively. Any modifications made in an appropriate manner by SERTO must be incorporated accordingly.

## 15. Application and monitoring

All SERTO employees are required to abide by this Code of Conduct. It is an essential part of their contract of employment and must be issued to new employees at the beginning of their employment. Employees who breach this Code of Conduct can expect to be subject to disciplinary measures in accordance with local company regulations. This may include termination of their employment without notice.

## 16. Duty to report

Any enquiries or indications as to potential breaches of this Code of Conduct should be sent to the management of the relevant group company or directly to SERTO AG, Langfeldstrasse 117, CH-8500 Frauenfeld. Employees who ask questions or report breaches of this Code of Conduct may not suffer any discrimination from their superiors as a result.

### Whistleblowing

Incidents can be sent to [Compliance-Whistleblowing@serto.com](mailto:Compliance-Whistleblowing@serto.com). One of the two Compliance Officers will confirm receipt and set the process in motion.

The Compliance Officers anonymise all reports received to guarantee that whistleblowers will be protected and will remain anonymous. It is important for SERTO to know the identity of whistleblowers in order to settle any follow-up questions and to inform them of which further steps are being taken. Data protection guidelines are observed in this respect.

Incidents of which there is evidence can be reported to the following contact address:

STRICTLY CONFIDENTIAL  
SERTO AG  
Compliance Management  
Langfeldstrasse 117  
CH-8500 Frauenfeld

### Disclaimer

This Code of Conduct does not grant employees or third parties any rights enforceable against SERTO. Subject to modification.