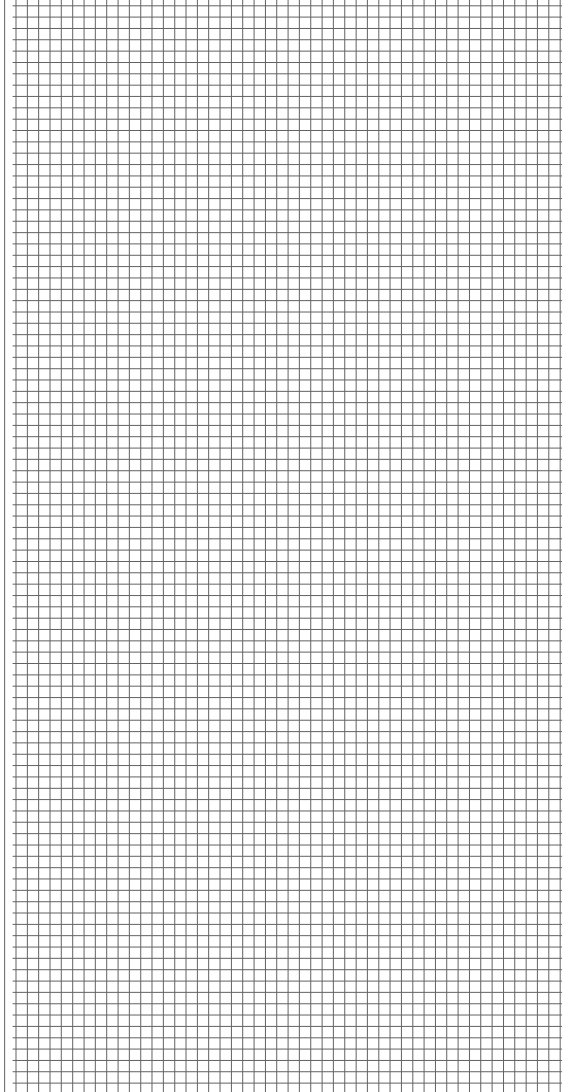


# **Uster Technologies AG**

## Uster Group Code of Conduct



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## **1 About this Code of Conduct**

This Code of Conduct establishes the ethical guidelines for the Uster Group<sup>1</sup> based on which we should take our decisions, both as individuals and as employees of a global company. This Code of Conduct sets out the values and convictions that we believe in and that our activities must align with.

This Code of Conduct applies to all employees of the Uster Group, irrespective of their function, position, or location, and regardless of whether they are permanently employed or work only temporarily with us. We expect all our employees and business partners of the Uster Group to respect, follow and implement the principles contained in this Code of Conduct in their daily business and the organization of all our business processes.

## **2 Responsibilities and respect within the Uster Group**

The objective of the Uster Group is to achieve sustainable and profitable growth. Our leadership principles are based on objectives and delegation of responsibilities and authority.

We strongly believe that integrity and fairness are leading principles in our business and that this should be reflected in all our activities. We fully commit to conducting business with honesty and applying high ethical standards to all our operations, always complying with all legal requirements applicable to us and our activities.

## **3 Employment and business partners**

We are committed to creating a work environment of mutual trust where everyone is treated with dignity and respect. We provide equal opportunity in all aspects of employment and will not tolerate harassment or discrimination of any type in our business activities. Given our international business, we are regularly in contact with other cultures and traditions. It is essential that we respect and support each other as this is the only way to achieve individual and entrepreneurial success.

We only work with partners that treat their employees fairly and generally comply with applicable laws, particularly with those regulations regarding social benefits and working conditions. We expect our business partners to refrain from using forced labor, intimidation or employing children under the age of 15 or children who are obliged under the applicable local law to attend school.

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<sup>1</sup> Uster Group consists of all companies belonging to Uster Technologies AG in any form including all their employees.

## **4 Health and safety**

We are committed to providing all employees with a safe and secure work environment. It is the responsibility of all employees to follow applicable health and safety rules. We do not tolerate the use of alcohol or illegal drugs in the workplace.

## **5 Respect for the environment**

We are aware of the environmental impact that our business activities may have. We are fully committed to complying with all applicable environmental laws and strive to minimize our ecological footprint by using and implementing ecologically friendly technologies and processes.

## **6 Conflicts of interests**

Conflicts of interest occur when the private interests of an employee or business partner of the Uster Group collide with Group's business interests. This would be the case for example if a close family member of an employee were to benefit from business done with the Group. Any such conflicts should be avoided.

## **7 Anti-Corruption**

We do not tolerate corruption or bribery in any form. Giving any undue advantage to influence the judgment or behavior of a person in a position of power is not allowed, whether this person is in government or in private business. Similarly, no person acting on behalf of the Uster Group may accept or solicit any such undue advantages.

We will strictly adhere to the principles set out in our Anti-Corruption Policy and ensure that all our employees and business partners respect these principles when acting for or on behalf of the Uster Group.

## 8 Anti-trust law

Achieving our goals requires us to compete actively in the market. Anti-trust or competition law is intended to help preserve the open and free market economy. The Uster Group is determined to adhere to the applicable anti-trust laws and regulations in the various countries in which we operate. Every employee is bound to comply with the principles of fair competition.

We do not enter into agreements or arrangements with competitors that unlawfully fix or set prices, whether directly or indirectly, or that allocate products, customers or territories, or which limit production, procurement, or supply quantities. We do not participate in any other practices aimed at aligning market behavior between competitors. It does not matter whether the agreements are made in written form, orally or otherwise, e.g. by tacit collusion. Anti-trust law, however, does not apply to agreements or business transactions between different companies within the Uster Group.

Anti-trust law is highly complex. Therefore, any agreements made with competitors or third parties that may have an impact on the free competition in the marketplace must pass a legal review. This applies in particular to exclusivity clauses, flat rates, territorial restrictions, linking clauses and agreements concerning intellectual property (such as patents, trademarks, copyrights, know-how and business secrets), including in particular any license agreements.

Anti-trust laws prohibit the abuse of a dominant market position. Therefore, any market behavior and marketing strategies in areas where the Uster Group may have a strong market position must be subject to a legal review.

All employees and business partners of the Uster Group should be aware that anti-trust laws usually not only apply to business dealings within a specific country but also internationally, in particular if these activities abroad have an effect on the domestic market.

## 9 Trade Controls, Sanctions and Embargoes

The Uster Group is committed to a policy of compliance with all applicable international, regional, and national export control laws, sanctions, restrictive measures programs and embargoes, such as regulations and rules that prohibit unauthorized trade in military-, dual-use and other strategic goods and services as well as financial or commercial dealings with specially designated/listed individuals and entities.

## **10 Protection and proper use of the Uster Group's assets**

Our assets are essential for fulfilling our duties as employees of the Uster Group. We all have an obligation to ensure the proper and efficient use of our assets and use them for legitimate purposes and Uster business only.

We duly protect any proprietary information, including intellectual property such as patents, trademarks, copyrights, trade secrets and keep all confidential business information secret. Employees with access to Uster Group's confidential information or business secrets are not allowed to disclose this information to third parties (including friends and family) or to use it in any other way than for company purposes.

## **11 Reporting non-compliance**

We expect and encourage our employees and business partners to report any breaches of this Code of Conduct. Doing so helps to protect our reputation and integrity and ensures that we identify business risks early on. We are fully committed to giving our employees the opportunity to report their concerns to a person of trust and on an anonymous basis.

We will not tolerate any kind of retaliation or discrimination against employees who in good faith report illegal and/or unethical behavior. Any such retaliation or discrimination will be treated as a violation of this Code of Conduct.

## **12 Further information**

Should you have any questions about this Code of Conduct, please reach out to your responsible contact at Uster.

Uster Technologies AG

July 1, 2023