

CODE OF CONDUCT

Code of Conduct of zwissTEX Germany GmbH

Subject of the zwissTEX Code of Conduct

This Code of Conduct defines the values, principles and practices that govern the business activities of zwissTEX Germany GmbH and its contractual partners as well as third parties engaged by those contractual partners. It contains basic principles for compliance with ethical standards and creates a framework for working environments that promote integrity, respect, fair conduct and sustainability. A business policy that complies with laws and principles serves the long-term interests of the company and each individual acting on behalf of those interests. The latest version of this Code of Conduct is available digitally in both German and English at <https://zwisstex.com/downloads/>.

Scope of the zwissTEX Code of Conduct

All employees and members of the management of zwissTEX Germany GmbH are bound by the provisions of this Code of Conduct. In addition, zwissTEX Germany GmbH expects that its contractual partners who supply zwissTEX Germany GmbH with goods, materials and/or services, as well as their employees, act responsibly and commit to the basic principles set forth in this Code of Conduct. If the contractual partners commission third parties (e.g. subcontractors) within the scope of the business relationship with zwissTEX Germany GmbH, these third parties shall also be obliged by zwissTEX's contractual partners to comply with the basic principles set forth in this Code of Conduct.

When the term "company" is used in the following, it refers to zwissTEX Germany GmbH itself, its contractual partners, and third parties commissioned by the contractual partners.

Compliance with laws and other regulations at national and international level

In all business decisions and actions, the company feels obligated to observe the applicable laws and other authoritative regulations at all domestic and international levels. The company promotes fair competition with honesty and integrity, also in relations between customers and contractual partners.

In the subsequent sections, some essential legal provisions are highlighted and their preservation is demanded.



Ethical behavior towards (potential) employees and among colleagues

The diversity and uniqueness of employees enrich the company's performance and innovative strength. The company respects and values each employee as an individual. Accordingly, the way in which people work together is characterized by appreciation, mutual understanding, openness and fairness.

No forms of undignified treatment, intimidation, discrimination or harassment are tolerated in any area of the company's activities. In particular, no discrimination will be tolerated on the basis of ethnic-cultural character, national, social or ethnic origin, skin color, age, disability, gender, sexual orientation, marital status, membership in employee organizations (including trade unions), religious beliefs, ideology, political views - insofar as these are based on democratic principles and tolerance of dissent - or other legally protected characteristics. Any rights of minorities and indigenous peoples shall be respected in any form and under special attention of the company.

The exclusion of these discriminations is guaranteed during all corporate phases that affect the employee:

Application, selection process, recruitment, training, working conditions, job assignment, compensation, benefits, promotions, discipline, dismissal and retirement to be taken. No deposits or financial guarantees will be required of employees. No identification documents or wages will be withheld from workers outside of a legal, contractual agreement. Any form of child labor, forced labor, debt bondage and serfdom as well as human trafficking are prohibited, rejected without exception and actively avoided. Any forms of bullying, harassment or abuse will not be tolerated. Any disciplinary procedures shall be written in a clear, understandable and comprehensible manner.

The company shall observe the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters. It ensures that the contracting or use of security forces does not lead to human rights violations. Neither directly nor indirectly does the company support actions by public or private security forces that illegally exercise control over mining sites, transport routes or upstream actors in the supply chain.

Freedom of association and collective bargaining

The company recognizes the fundamental right of all employees to form and/or join trade unions and employee associations and itself complies with the statutory regulations. The company management is committed to work with the employee representatives in an open and trusting manner, to engage in constructive and cooperative dialog as well as to strive for a fair balance of interests. A professional approach to employee representation that allows neither favoritism nor discrimination is part of the corporate culture. Where this right is restricted by local laws, alternative options employee representation that comply with the law shall be promoted.



Fair working conditions, working hours and remuneration

As a socially responsible employer, the company considers its employees to be of great value and demonstrates this in its compliance with working conditions that meet legal requirements. The performance of work is carried out on the basis of a recognized employment relationship established in accordance with national legislation or international labor standards, whichever provides greater protection.

The company's human resources policy contributes to providing each employee with the opportunity for professional and personal development and demonstrates this in appropriately flexible, company-agreed work schedules, as well as in the appropriate compensation of these employees. Any working time, break, time off and overtime models must comply with applicable national laws, industry standards or company agreements - whichever provides greater protection for the employee.

Employee compensation must comply with existing collective bargaining agreements and company agreements, if any.

The company shall ensure that minimum wages applicable by law or collective agreement are not undercut. In the absence of statutory or collectively agreed regulations, the remuneration of employees shall be based on industry-specific and locally customary remuneration and benefits that ensure an adequate standard of living for employees and their families.

The company must provide all workers with written and comprehensible information about their terms and conditions of employment, (including details of wages and pay periods), before they start work. Workers must be informed of details of pay on a regular basis at each pay period. All lawful forms of remuneration and social benefits shall be provided to the employee. Overtime shall be paid at a premium rate in accordance with the law and, where applicable, in accordance with the contract. Any form of unauthorized or unlawful deduction from wages is prohibited. Work-only contracts, subcontracts or work-at-home arrangements, training programs where there is no real intent to teach skills or create regular employment, and similar arrangements may not be used to avoid obligations to workers subject to labor or social security laws and regulations.



Occupational health and safety

Operational health and safety are a top priority for the company. Employee protection in the workplace and safety regulations must be strictly observed and serve to prevent health hazards. Safety in the workplace is a primary responsibility of each individual. Executives and managers are continuously required to act as important role models in this regard.

The company must provide safe, clean and hygienic conditions in all work and living facilities and communicate them clearly. All employees shall be provided access to clean restrooms and drinking water facilities, as well as appropriate food preparation and storage facilities, where applicable.

The company shall design and operate its facilities in strict compliance, continuous review and constant improvement based on legal safety regulations. This reduces the risk of accidents. In terms of occupational health management, the company undertakes root cause analyses and takes appropriate measures to prevent accidents and damage to health that occur during, result from, or are related to work activities. Sources of danger and hazardous substances of any form must be clearly identified in the respective company processes. Adequate safety precautions must be taken against fire hazards. The strength, stability and safety of buildings and equipment, including any living quarters, must also be ensured at all times.

Responsible parties must be aware of their responsibilities and corporate duties with respect to workplace safety. They must ensure that employees working in the company's operations receive regular and documented training in occupational safety and health issues and are provided with the necessary occupational safety equipment. Safety training must include the handling and disposal of chemicals and other, hazardous materials and/or waste.

The company must ensure access to adequate medical assistance and facilities, including on-site first aid.



Commitment to the protection of natural resources, environment and climate

The company considers itself obligated to act in an environmentally conscious manner. In doing so, the company complies with the legal requirements for environmental protection that affect all operations at the company's respective sites. At sites where the applicable regulations do not achieve a level of protection that ensures environmentally sound operations, the company will take the necessary measures to achieve an adequate level of protection within the bounds of what is economically justifiable. The company demonstrably handles all natural resources responsibly and complies with all currently valid legal requirements and permits in this handling. The consumption of all natural resources (energy, water, wastewater), as well as the consumption of any air emissions and waste flows, shall be regularly recorded and analyzed. The company shall make a verifiable and annually evaluated contribution to the targeted reduction of these consumptions including measures for decarbonization and for the expansion of alternative, renewable energy generation - e.g. through photovoltaics). The company also endeavors to recycle as many of its own products, by-products and waste products as possible and to use recycled materials as alternative raw materials in production. Pollutant inputs and wastewater quality criteria shall be identified along the direction of flow. Where applicable and reasonable, a drainage plan should be prepared, from which the direction of wastewater flow and discharge points are identified. Where not already regulated by law, it shall be ensured that wastewater and aqueous sludges are properly stored and properly treated and/or disposed of either on-site or off-site.

The company complies with all legal regulations on air and water pollution control. In doing so, it also considers the potential for fugitive emissions, can identify major point sources of emissions, and regularly maintains all equipment containing ozone-depleting substances or other potential air pollutants.

The company ensures that all contracted disposal companies hold appropriate, current permits for this disposal. Hazardous and non-hazardous waste is stored separately and handled by employees who have been demonstrably trained for this purpose in all safety-relevant respects. Waste must be properly inventoried, managed, stored and transported in compliance with all legal requirements. Unless already regulated by law, no waste may be incinerated or dumped in an uncontrolled manner on the company's premises. Opportunities shall be sought to increase forms of reuse or recycling.

The company generally strives to implement and maintain management systems for the continuous improvement of its energy and environmental performance, such as ISO 14001. Furthermore, the company is improving chemicals management within its own processes and in the upstream value chain. To this end, it complies in particular with the requirements of the European REACH Regulation (EC 1907/2006) and the MRSL (Manufacturing Restricted Substances List) of the ZDHC initiative (Zero Discharge of Hazardous Chemicals) and passes on both requirements to its contractual partners and suppliers.

Where applicable, the company is committed to complying with applicable laws and industry standards in its processes and within its respective supply chain to protect soil quality, biodiversity and animal welfare. It formulates measures to compensate for land use and deforestation, and to professionally mitigate noise emissions.



Conflicts of interest

The company expects loyalty of its employees. All employees must avoid situations in which their personal or financial interests conflict with those of the company. Therefore, in particular, it is forbidden to take an interest in competitors, suppliers or customers or to enter into business relationships with them in a private capacity, insofar as this may lead to a conflict of interest. Conflict situations must not impair the interests of the company. Such conflicts of interest can arise in many situations: For example, no employee may accept benefits - in whatever form - that could reasonably be expected to influence business decisions or transactions of the company. Invitations must remain within the bounds of customary business hospitality. Employees shall not, by virtue of their position, personally benefit directly and/or indirectly by gaining access to confidential information. All employees have a duty to promote the legitimate interests of the company to the greatest extent possible. Any competitive situation as well as conflicts of interest with the company are to be avoided.



Ban on corruption

The company takes a clear stance against corruption and bribery. Conduct in which business is conducted by unfair means will not be tolerated. Company employees must not offer, receive or accept favors from business partners that could interfere with an objective and fair business decision or even give the appearance of doing so.



Dealings with authorities

The company strictly adheres to the legal requirements when dealing with governments, authorities and public institutions. When participating in public tenders, it observes the respective legal requirements and the rules of free and fair competition.



Consumer interests

The company takes the interests of consumers into account in its actions. It ensures that its products are safe and harmless to health in the sense of its respective intended use. Legal limit values must be complied with and, if possible, undercut. The interests of consumers are also appropriately taken into account in case of other information and sales measures.



Fair competition

The company seeks to conduct its business competently and ethically and protects fair competition in all markets in which it operates. It does so by complying with applicable antitrust, competition and restraint of trade laws.



Export control

The company's economic and financial activities are monitored internally on an ongoing basis and are subject to the control of auditing firms and the respective banks and financial supervisory authorities. It is crucial for the company to respect the numerous national and international import and export control laws and regulations. The company complies with the rules of foreign trade, tax and customs law in its global activities.

The company complies with economic and trade sanctions regulations, embargoes against certain countries, other companies or persons, and prohibitions on certain imports and exports. The company also continuously and carefully checks the identity of its customers, suppliers and other business partners for compliance with legal requirements. Violation of economic and trade sanctions regulations is associated with negative consequences. Permanent monitoring measures are therefore essential.



Money laundering

The company maintains business relationships only with those business partners of whose integrity it is convinced and ensures that the respective applicable regulations against money laundering are not violated in any way.



Handling of assets

All employees are responsible for the proper and careful handling of company property. Each employee is obligated to protect the company's property against loss, damage, misuse, theft, misappropriation or destruction.



Handling internal knowledge

All employees are obliged to ensure a fast and smooth exchange of information within the company. Information must be passed on correctly and completely to relevant stakeholders, unless in exceptional cases - in particular due to confidentiality obligations - overriding interests exist. Relevant knowledge may not be unlawfully withheld, falsified or selectively passed on. Reporting within the company and to organizations or persons outside the company must be truthful. The contents of all annual financial statements, annual reports, business papers and business books of the company must be presented accurately and comply with the applicable legal requirements and accounting guidelines.



Secrecy and data privacy

A large part of the Company's business information is confidential or legally protected, so there is a duty of confidentiality. This does not apply if publication of the information has been authorized or is mandatory by law or regulation. The duty of confidentiality relates in particular to intellectual property. This includes trade secrets, patents, trademarks and copyrights, as well as business and marketing plans, designs, business papers, salary data and all other unpublished financial data and reports. All personal information about employees, customers, business partners and suppliers, as well as other third parties, is used carefully and treated confidentially within the company; in full compliance with data protection laws. The protection of this information must be fulfilled with the utmost care.



Intellectual property and plagiarism

The company prohibits the use of plagiarized or counterfeit materials. It also respects intellectual property and will not use or publish it without authorization. In particular, this applies to intellectual property that is protected by patents, copyrights or trademarks.



Implementation and monitoring, whistleblower system

The rules contained in this Code of Conduct form a core part of the company's working culture. The company considers strict compliance with these principles to be indispensable and holds each individual responsible. If internal employees of the company and external persons have concerns or complaints about the standards contained in this Code of Conduct or knowledge of any violation of the standards of conduct contained herein, he/she is required to bring this to the attention of the company immediately for clarification.

If an internal employee is not satisfied with the clarification provided by the relevant manager, he/she may also confidentially contact the human resources department, the company's works council (if instituted) or the executive board.

Furthermore, internal employees of the company and external parties may report a violation of the Code of Conduct confidentially and discreetly via the external whistleblower system of zwissTEX Germany GmbH:

<https://zwisstex.vispato.com/>

The system guarantees complete anonymity (no storage of IP addresses or device data, end-to-end encryption) and enables confidential two-way communication between the reporting person and the case handler. It complies with the requirements of EU Whistleblowing Directive 2019/1937 and the German Whistleblower Protection Act (HinSchG).

Serious violations of the Code of Conduct endanger the social and economic interests of the company. If there are indications or concrete indications of a violation of the Code of Conduct, managers are obligated by their function as role models to immediately contact the appropriate bodies. Objections or complaints raised in good faith must be resolved confidentially, objectively, openly, without soliciting the persons and without forms of retaliation. Receipt of a complaint will be confirmed in writing to the complainant.

zwissTEX Germany GmbH reserves the right to check compliance with all requirements specified in this Code of Conduct at the contractual partner's premises after prior notice and in the presence of representatives of the contractual partner, during normal business hours and in accordance with the respective applicable law.



Legal consequences of violations of the Code of Conduct of zwissTEX Germany GmbH

If a contractual partner violates these laid down basic principles, zwissTEX Germany GmbH sees itself obliged to extraordinarily terminate the business relations with this contractual partner. However, instead of extraordinary termination, zwissTEX Germany GmbH may also take alternative measures if the contractual partner assures and can prove in writing that it has immediately initiated suitable measures to prevent future violations.



Confirmation of the supplier or commissioned third party

We hereby confirm that we have received and understood the zwissTEX Code of Conduct.

We assure that all our actions are carried out in accordance with the contents of the zwissTEX Code of Conduct.

Company name

Company number

Name & Function

Date, Location & Signature

ZWISS
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zwissTEX Germany GmbH
Heuchlinger Straße 33-35
89547 Gerstetten-Heldenfingen
info@zwisstex.com