



SFS Group Code of Conduct

This explanatory document complements the booklet listing the core messages of the Code of Conduct and the Corporate Principles.

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For the sake of simplicity only the male form is used in some cases. It goes without saying that the female form is always included.

Dear employees,

The SFS Corporate Principles have been a fixed element of the SFS culture for many years. They set out important guiding precepts and values applying to each and every individual, all teams and the SFS Group as a whole.

SFS has grown continuously into an international corporate group through selective investment in markets, business ideas and companies as well as globalisation. We therefore often work today with people from different cultures and countries.

Expectations and sensitivity with regard to acting correctly and with integrity in business dealings with other companies have also increased considerably.

Proper conduct by the company also presupposes proper conduct by each and every employee. This Code of Conduct has been drawn up in order to provide the relevant guidelines. It is based on the principles of integrity as well as fair and ethical behaviour. Each and every one of us must assume responsibility for his daily actions in the business context, be familiar and comply with the Code of Conduct.

The SFS Corporate Principles are our model for this. While these formulate the ideal approach to business, the Code of Conduct sets out essential guidelines for SFS employees in their working environment.

The Code of Conduct is binding upon the management as well as each and every employee of the SFS Group – irrespective of their work or position. It is an important element for the sustained positive development of SFS in a constantly changing international environment.

Responsibility for consistent compliance with this Code of Conduct lies with each and every employee. Violations of the Code of Conduct must be resolutely penalised. We rely on you to contact your line manager or the Site Manager in the event of queries or violations. The SFS Compliance Officer is also available to answer queries (P +41 71 727 63 73, compliance@sfs.biz). He is bound to secrecy.

Thank you for actively supporting its implementation and for your daily commitment to the SFS Group.

Sincerely yours,
Board of Directors and Group Executive Board of the SFS Group



Heinrich Spoerry
Chairman of the Board of Directors



Jens Breu
Group Executive Board, COO

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I undertake to comply with laws and regulations.

Compliance

I comply with the laws and regulations of relevance to my sphere of responsibility.

It is my personal responsibility to inform myself of legal requirements and restrictions and to comply with them.

Clarification

If I am uncertain how to act or whether an action is legally admissible, I first clarify the situation with my line manager, the Site Manager or the Compliance Officer, and act only after obtaining their approval.

Export regulations

I adhere to national and international export control regulations and legislation governing the export of armaments. This is applicable in particular if goods or services are purchased, provided as intermediary, manufactured or brought into circulation, or if technology is transferred or accepted. I also check in advance whether official approvals are required.

2 I act in accordance with ethical standards.

Non-discrimination

I act ethically and fairly, and respect the rights and dignity of individuals.

I treat all employees and business partners alike, irrespective of their attributes, such as race, gender, age, religion, origin, nationality, sexual orientation, physical condition, trade union membership or political convictions.

Preferential treatment

I do not exploit my position to gain personal advantage for myself or persons close to me. This also applies in particular to the exploitation of insider information (see Intranet - SFS Group – Insider Information).

Personal offence

I respect and protect employees' privacy.

I avoid any harassment or personal offence. This includes, for example, mobbing, disparagement, intimidating or aggressive actions or words and insistent sexual advances.

Care

I treat the property of SFS responsibly and carefully. This includes, for example, furniture, equipment, machinery, vehicles and buildings, and also intellectual property such as patents, trademarks, copyrights, know-how, business and corporate plans, technical expertise and confidential information.

Hazards

I protect myself and other employees against hazards. I am therefore sober and drug-free during working hours, wear protective clothing where specified and comply with stipulated safety regulations.

If I become aware of threats to the safety or health of employees at the workplace, I take appropriate action to eliminate them.

Child labour

SFS does not tolerate any forced or child labour in its plants. SFS does not work with partners who accept forced or child labour.

Environmental protection

I am committed to environmental protection in the interests of the current and future generations. In my work I adhere to regulations which have been adopted for the protection of the environment. I support solutions which preserve the environment.

3 I communicate openly; I protect confidential information.

Confidentiality

I regard all information as confidential which is not publicly accessible or known.

I protect private data and confidential information of SFS and its business partners. This also applies after the termination of my employment relationship with SFS.

Confidential information also includes, regardless of its form (oral, written or electronic), price agreements, drawings, specifications, data on employees and business partners, patents, technical expertise, inventions and other know-how as well as financial information.

I am aware that any kind of collection, processing, storage and transmission of data must be conducted in conformity with the internal or legal stipulations.

Communication

I communicate actively, openly and honestly with employees and persons outside the company, informing them about everything they need to perform their tasks and duties.

Statements I make and documents I draw up are accurate and truthful.

I know that executive management and the personnel specially appointed by them are solely responsible for communication with the media.

4 I am committed to fair competition and do not tolerate any form of corruption.

Corruption

I am not open to bribery. I do not demand or accept any gifts or payments.

I do not give bribes. I do not promise or make gifts or payments, nor do I offer them.

Gifts

Gifts are understood to include any items of material value, services, invitations, favours and discounts. Exceptions to this are gifts "in tune with courtesy and national custom", where it can reasonably be assumed that they do not influence business transactions.

Influence

I refrain from any dishonest actions with which I could influence decisions made by customers, suppliers, competitors or official bodies.

Such actions include proffering gifts as set out above, side agreements in contracts, paying bribes, granting advantages or price-fixings.

Commissions

I document lawful, business-related agent's commissions, premiums, discounts, refunds, etc., in full. I settle them openly in order to exclude any involvement in money laundering and other dishonest transactions.

Fairness

I respect and comply with the rules of fair competition.

I act with integrity and do not utilise information obtained illegally.

Understandings

I conduct no discussions with competitors about prices, terms and conditions or capacity. I know that understandings to refrain from competition, to submit dummy quotations in response to tender invitations or to allocate customers, territories or production programmes are inadmissible. This also includes informal discussions, informal gentlemen's agreements or other forms of understanding which seek or bring about any of the above-mentioned restraints of competition.

Conflicts of interest

I avoid conflicts of interest and situations in which family links or personal interests are contrary to those of SFS.

Conflicts of interest can arise, for example, from the following:

- spare-time occupations
- investments in companies which have business relationships or are in competition with SFS
- membership of boards of directors, supervisory boards or boards of trustees

- holding public office
- business relationships with companies managed by family members or life partners or in which family members or life partners hold an interest.

I clarify in advance with my line manager and/or the Site Manager whether these activities are permissible.

Sponsorships

Donations and sponsorships are always centrally approved by the authorised managers in the individual companies of the SFS Group. Awards must always be made transparently.

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I am responsible for compliance with the Code of Conduct.

Responsibility

I am familiar with the Code of Conduct. Each and every employee is responsible for compliance with it in his or her sphere of responsibility.

If I am uncertain how I should act or whether a planned action complies with the rules of the Code of Conduct, I first clarify the situation with my line manager, the Site Manager or the Compliance Officer, and act only after obtaining their approval.

Violations

If I become or am made aware of an instance of non-compliance with the Code of Conduct, I report this immediately to my line manager, the Site Manager or the Compliance Officer.

I am aware that violations of this Code of Conduct will be resolutely penalised. If an investigation is conducted due to non-compliance, each and every employee is obliged to disclose all relevant facts known to him.

Violations of the Code of Conduct can have consequences for the employer/employee relationship (extending to termination of employment in the event of serious violations) and can result in criminal proceedings or compensation claims against the culprit.

Compliance Officer

The Compliance Officer of SFS is listed on the Intranet under "SFS Group" and can be reached orally and in writing (P +41 71 727 63 73, compliance@sfs.biz).

Reports can be made anonymously. The Compliance Officer is bound to secrecy.

Reports of violations of this Code of Conduct will result in no negative consequences for the employee making the report.