

Sécheron Hasler GROUP

Smart. Safe. Swiss.

CODE OF CONDUCT



Code of Conduct

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1. INTRODUCTION

- This document contains the fundamental principles of the code of conduct of Sécheron Hasler Group to be applied by all our employees*, consultants and partners/agents. The goal of this code is to set a framework for the successful and sustainable development of our group.
- Respect for the individual and integrity in everything we do is of the highest importance for our group.
* In the Code of Conduct, the term of employees also includes temporary employees

2. LEGAL COMPLIANCE

- All employees, consultants and partners/agents must conduct business with honesty and integrity and operate in compliance with all applicable laws in every country where we are present and do business.

3. RESPECT OF EMPLOYEES / EQUAL OPPORTUNITIES

- Respect for the personal dignity, privacy and personal rights of every individual are a high priority for our group.
- Sécheron Hasler Group does not tolerate any discrimination or differential treatment in our organization, whether for reasons of race, nationality, skin color, sexual identity, political, religious or other conviction, gender or age.
- We are committed to equal treatment for all employees in connection to hiring, promotion, training, compensation, termination and disciplinary action.
- To ensure an atmosphere of quality work, the relationships between employees must be conducted with mutual respect, frankness and openness.

4. PROHIBITION OF CHILD LABOUR

- No employees will be under 16 years old, unless the local statutory provisions set a different age limit.
- Sécheron Hasler Group expects its suppliers to respect this limit.

5. REPUTATION OF THE SECHERON HASLER GROUP

- Respect for business integrity is essential to maintain the reputation of our company in the world. The reputation of our company is our most precious asset.
- The reputation of our group is determined by our actions and how each one of us presents and conducts himself/herself.
- Every employee, consultant and partner/agent should be concerned with maintaining and promoting the good reputation of the Sécheron Hasler Group.

6. DIVERSITY, MINORITY PROTECTIONS AND SEXUAL HARASSMENT

- Unwanted conduct of a sexual nature, including unwanted sexual acts and requests to carry out sexual acts, physical contact of a sexual nature, comments of a sexual nature, as well as the unwanted showing or public exhibition of pornographic images, which takes place with the purpose or effect of violating the dignity of the person concerned, in particular where it creates an intimidating, hostile, degrading, humiliating, or offensive environment is unacceptable. Discrimination or bias against minority groups is strictly prohibited in all forms, including hiring, promotion, compensation, and daily interactions. The organization enforces a zero-tolerance policy for any behavior that undermines equality or marginalizes minority employees.
- We never participate in any harassment, bullying or violation. We ensure compliance with all applicable laws and regulations. We train our employees to recognize and report suspicious behavior. We are committed to creating a workplace where all employees, regardless of race, ethnicity, religion, gender identity, sexual orientation, disability, or other minority status, are treated with respect and dignity.

7. MODERN SLAVERY

- We prevent any involvement in all forms of modern slavery, including human trafficking, forced, bonded or indentured labor.

8. FAIR COMPETITION

- All employees, consultants and partners/agents must conform to the rules of fair competition.
- Employees, consultants and partners/agents shall not directly or indirectly offer, promise, grant or authorize the delivery of money or anything else of value in professional activities, to whomever, with the aim of obtaining an unfair advantage.
- The employees, consultants and partners/agents may not obtain competitive intelligence by using industrial espionage, bribery, theft or electronic listening, or communicate knowingly false information about a competitor or its products or services.

9. ETHICS IN BUSINESS

- At Sécheron Hasler Group, all employees and managers are expected to uphold the highest standards of integrity, transparency, and ethical conduct, actively promoting a culture that prevents and addresses unethical behavior, including corruption, conflicts of interest, and money laundering, in alignment with our Business Ethics Policy (QMD-02037).

10. CUSTOMER AND SUPPLIER RELATIONSHIP

- Every employee, consultant and partner/agent must be concerned during his/her daily activity with the importance of customer and supplier relationships. To guarantee durable development, each communication with our customer/supplier needs to have an optimal level of quality.

11. CONFIDENTIAL INFORMATION

- All employees, consultants, and partners/agents must keep strictly confidential all information (whether oral, visual, documentary, magnetic, electronic, graphic, or digitized) about Sécheron Hasler Group (including all affiliate companies). Confidential information about Sécheron Hasler Group includes all information on operations, procedures, processes, methodologies, programs, data, software, know-how, products, technologies, business activities, marketing plans, strategies, forecasts, licenses, trade secrets, commercially sensitive information (e.g., prices, costs), financial affairs, personnel matters, and organizational responsibilities that has not been made public in a legal way and is not common knowledge among competitors, customers, suppliers, or others. Maintaining confidentiality also means not disclosing confidential information to other employees, external consultants, or partners/representatives who are not authorized to access such information and who are not bound by a confidentiality agreement with Sécheron Hasler Group.
- Also, confidential information shall not be transmitted to search engines, AI-enabled tools, or third-party software which could be collecting or processing this information, unless explicitly authorized under company-approved procedures. Use of confidential information about Sécheron Hasler Group with AI-enabled tools (e.g., for code analysis, bug fixing, or commercial purposes) is permitted only when the AI-enabled tool has been evaluated and approved by Sécheron Hasler Group Head of IT and Group Head of ERP for handling such confidential information. In such cases the use is limited to the approved scope and business purpose. No confidential information shall be exposed to external or non-approved AI platforms. Employees are responsible for ensuring that AI usage complies with the Group's confidentiality, cybersecurity, and data protection policies.

12. ENVIRONMENTAL PROTECTION

- Protecting the environment and conserving natural resources are high priorities for our company. Through management leadership and employee commitment, Sécheron Hasler Group strives to conduct its operations in a manner that is safe for the environment and to continually improve environmental performance.
- All employees, consultants and partners/agents must contribute to these goals through their own behavior.

13. HEALTH AND SAFETY

- Protecting the health and safety of employees in the workplace is a high priority for Sécheron Hasler Group. We take measures to prevent accidents and occupational illness.
- All employees, consultants and partners/agents must assist the group to obtain a safe work environment to prevent accidents.

14. DRUGS AND ALCOHOL

- To promote a safe working environment, the consumption or being under influence, possession, trafficking, distribution, offering or sale, manufacturing, dispensing or transferring of illicit drugs and alcohol, during working hours, on company business trips, on duty and/or company property is strictly prohibited. The company reserves any legal rights in case of non-respect of local legislation about drugs usage.
- The presence of alcohol at specific company business events will be strictly limited and monitored to a reasonable consumption and any abuse may lead to disciplinary actions as per the company's local best practices. In case of abuse, we expect other employees to take appropriate action to support the affected employee such as, but not limited to, getting health support, returning home, etc.
- While at work or on duty, it is strictly prohibited to be under influence of drugs or alcohol, and the company may take legal action in case of abuse. In case of an incident under the influence of drugs or alcohol the company will retain this as negligence and appropriate actions may be reserved such as official warning and termination for cause.
- In case of doubts, the company may have to proceed to random testing for a limited group to preserve health and safety in the work environment.

15. PRIVACY AND PERSONAL DATA

- Sécheron Hasler Group acknowledges the importance of personal data protection to strengthen individual rights. Global standards for safeguarding personal data with a high level of protection of the data collected are in place. GDPR, LPD and overall rules on data protection are always respected and applied by all departments.
- Employees should use common sense while sharing their data and we expect employees to inform the GDPR representative (our CHRO) of any suspicious situations.
- Specific sessions will be conducted and shared during the year with all employees to raise awareness on these topics.

16. PROPER USE OF BUSINESS PROPERTY

- Email and internet communication made through Sécheron Hasler Group workplaces, networks, devices and service providers may be treated as company business information and so may be accessed, retrieved, monitored and disclosed when needed and subject to applicable legislation and contractual agreements. All elements stored and detained in a company asset belonging to the Sécheron Hasler Group can be used by the company. The HR department (our CHRO) will take responsibility to assess the principle of proportionality before any access is granted.
- Employees using company assets for private purposes may store their own data into a personal folder designated clearly as such "private" to prevent access to that specific data in case of business need. It is expected the private usage to be exceptional and diligent use of data storage (no videos, no pictures albums, no games) on company devices.

17. CONFLICT MINERALS POLICY

- Sécheron Hasler Group, its suppliers and subcontractors of its supplier, do not work directly with smelters producing 3TG materials. For this reason, the group is checking with its suppliers to make sure their supply chains do not include non-recognized smelters, which are not included in CFSI CMRT list.
- The group is checking with all its suppliers to make sure all of them work with smelters identified in the CFSI CMRT list. Sécheron Hasler Group constantly updates the smelters with whom suppliers work in the CMRT Smelter list of the Group.

18. COMPLAINTS

- Employees, consultants, partners/agents, customers and suppliers can send an email or call the complaints contact person if they have observed or have been informed of any illegal conduct or violation of this Code of Conduct.

Complaints contact person:

Head of Quality and HSE of your business unit

- If an employee would like to speak about a personal issue, GDPR, he/she can contact the CHRO or the employee committee when applicable.

19. VERIFICATION OF CODE OF CONDUCT COMPLIANCE

- Every month the director's committee discusses any detected case of non-respect of the code of conduct and defines the required measures.
- Every year management discusses potential issues with all sales staff at least once regarding fair competition.
- Every year management reminds all staff at least once about the importance of the Code of Conduct and reminds them of the key principles, as well as informing them about any changes/updates.