

## **Code of Conduct**

### **Preamble**

Our code of conduct provides a guideline for the entire company of Saxonia-Franke AG and therefore applies to each of us in equal measure. It is specifically directed towards the management board, the management personnel and all our employees. On the one hand, it represents the expectation from us to live up to the values and principles described in it and at the same time, it indicates to the outside world a responsible attitude towards our business partners, customers and our employees.

### **Obligations of corporate management**

Saxonia-Franke AG is committed to act in an economically and socially aware and environmentally-friendly manner. The company strives to do all business competently, built upon an ethical and moral foundation, and to adhere to fair competition in all markets in which it is active. This includes the compliance of the applicable laws and the acceptance of prohibition on restrictive practices or restrictions of competition. Under all circumstances, we would like to avoid gaining inadmissible advantages over customers, suppliers or competitors.

### **Team spirit, constructive cooperation**

We continually question existing solutions and come up with new ideas for the benefit of our customers. To this end, we promote constructive cooperation between our employees. Your interests and requirements from us are crucial for our work and further development. It is only through consistent teamwork that we can be successful in the various business segments.

### **Standards of cooperation**

We expect all of our employees to always act in accordance with the highest professional standards. If employees violate existing guidelines, rules or regulations in the course of their work or through their behaviour, the concerned employees can expect disciplinary measures.

### **Open communication with employees**

We do not conceal misconduct. If employees report a factual or suspected misconduct in good faith, we will not tolerate any attempts at intimidation or reprisals against them. We understand "in good faith" to mean that the employee is convinced that his depiction of the situation is true. This applies regardless of whether a later examination does or does not confirm the employee's version.

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### Dialogue with cooperation partners

As matter of principle, all business information of our partners and their trade secrets are treated in a sensitive and confidential manner. Necessary documents are factually created, stored or, if necessary, returned or destroyed after the end of the cooperation.

### Customer orientation

We behave fairly and honestly towards our customers and business partners at all times. We record the wishes, needs and expectations of our customers and business partners in order to ensure target-oriented implementation in terms of products, services or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners based on trust.

### Accepting gifts, donations

#### a) Gifts to our employees

Our employees do not demand or accept personal benefits from customers or suppliers, which influence or could influence their own behaviour in relation to their own work for the company. If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognised as courtesy or goodwill (business gifts with the logo of the issuing company, such as a calendar or ballpoint pen). The management must be informed of gifts with a value exceeding the usual amount. If this is not possible, these gifts must simply be rejected.

#### b) Gifts from our employees

Gifts on our part may also only be offered in a context that is customary for the business relationship and to a materially reasonable extent. The recipient must not be able to associate this with an obligation that would influence his business decisions.

#### c) Donation

The company of Saxonia-Franke AG does not fundamentally donate to political parties, individuals or organisations whose goals contradict our corporate philosophy or damage our reputation. The granting of donations always takes place transparently.

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### **Bribery and corruption**

We do not tolerate any form of corruption and bribery, regardless of whether this damages our company assets or the assets of third parties. We ensure the use of control mechanisms to prevent bribery, theft, embezzlement, fraud, tax evasion or money laundering. Our employees are prohibited from accepting or giving favours of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (order placement, project contract, etc.). Our business partners are also encouraged to avoid conflicts of interest that constitute a risk of corruption.

### **Data protection**

We treat all personal data of our customers, business partners and employees with the greatest care. This includes names, addresses, telephone numbers as well as date of birth or information about the current state of health. Our employees are obliged to take all measures to secure the data, which are suitable for protecting our IT system from both internal and external data theft. This applies in particular to misused passwords and unauthorised downloading of files (particularly of inappropriate material from the Internet) in the company.

### **Environmental protection**

Protecting the environment and the climate is a very important matter for us. Our employees are encouraged to treat all natural resources used in our company (e.g. energy and water) with consideration. Our employees are expected to deal responsibly with the manufacture and sale of our products and/or services. To protect our employees, we comply with all laws and regulations that concern occupational health and safety. For this purpose, measures are taken, especially by our management personnel, to create a healthy and safe working environment for our employees.

### **Compliance with the law**

We oblige our managers to familiarise themselves with the laws, regulations and rules relevant to their area of responsibility and to comply with them without exception. Our managers, in particular, bear a high level of responsibility in fulfilling the Code of Conduct. The business practices of our business partners and their suppliers must also take into account the applicable laws. This especially applies to import, export, and domestic trade in goods, technologies or services, but also to payment and capital transactions. A violation of economic embargoes as well as of rules of trade, import and export control, such as terrorist financing, for instance, must also be precluded by our business partners.

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### Fair competition

We are committed to fair competition and abide by the laws and rules. We refrain from making agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers, which hinder fair competition. We do not participate in any anti-competitive boycott.

### Non-discrimination policy

In principle, any form of discrimination is prohibited. This is irrespective of nationality, ethnicity, age, gender, sexual orientation, marital status, pregnancy, a disability, or religion or ideology. Promotions and recruitments are always carried out in a non-discriminatory manner.

### Dealing with internal company matters

We attach great importance to the fact that the products manufactured, the work equipment used and the intellectual property of the company are handled carefully and responsibly.

### Protection against child labour and forced labour

We strictly reject any kind of child labour or forced labour without exception and expect our business partners to do the same. School-age children (younger than 16 years) may not be employed even if the legal requirements of the respective country of our supplier were to permit this.

### Implementation and enforcement

The company of Saxonia-Franke AG undertakes to make every effort to comply with the principles and values described in this Code of Conduct.

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