

# HUBER+SUHNER Business and Ethics Code



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## Message from the CEO and the Head Corporate HR

HUBER+SUHNER is committed to conducting its business in accordance with high ethical standards, integrity and compliance with applicable rules. Our reputation towards all stakeholders is fundamental in delivering excellence in connectivity solutions.

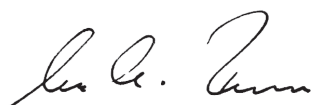
Social awareness and a strong ethical attitude shall govern all our actions. We shall conduct our business operations in a responsible, honest, fair and considerate manner making use of good judgment.

The Business and Ethics Code defines the principles at HUBER+SUHNER which are fundamental to the way we conduct our day-to-day business. We do not only consider our business performance important, but also the way we achieve our objectives throughout the organisation.

We expect every officer, manager and employee of companies under the management control of HUBER+SUHNER to take responsibility for living up to these high ethical standards. Managers shall promote these standards through personal leadership and training.

Furthermore, we expect our business partners to adhere to this Business and Ethics Code and to adopt provisions consistent with this code.

Herisau/Pfäffikon  
October 2014



Urs Ryffel  
CEO



Patricia Stolz  
CHRO

# 1. Social responsibility and the working environment

## 1.1 Equal and non-discriminatory treatment

HUBER+SUHNER ensures equality of opportunity and equal treatment in order to prevent discrimination on the basis of ethnic background, race, gender, language, religion, political opinion and membership of unions, national or social origin, social standing, sexual orientation, disability or age.

Selection of employees is based solely on their personal and professional qualifications, suitability and performance.

## 1.2 Forced and child labor

We do not tolerate forced or compulsory labor and respect and support children's rights to be protected against economic exploitation.

## 1.3 Protection against harassment

HUBER+SUHNER protects its employees against harassment in the workplace, in particular against any kind of sexual, physical or psychological abuse.

## 1.4 Health and safety at work

The health and safety of employees have top priority. HUBER+SUHNER ensures the provision of a safe and healthy work environment by implementing statutory provisions, monitoring procedures, preventing health risks and occupational hazards and providing personal training.

## 1.5 Compensation, working hours

HUBER+SUHNER respects and supports existing social standards. We adhere to local minimum pay legislation. In the absence of legal regulations, consideration shall be given to local industry standards.

Employees shall not be forced to work overtime in excess of what is deemed reasonable and shall not exceed the maximum working hours as prescribed by local labor laws. Employees are encouraged to balance work and personal commitments.

## 1.6 Trade unions

HUBER+SUHNER employees have the right to join a trade union of their choice within the framework of the applicable laws.

## 1.7 Privacy

We respect the privacy of all employees, business partners and customers. Personnel data are handled responsibly and in compliance with applicable privacy laws.

## 1.8 Communication

HUBER+SUHNER fosters open communication between its managers and employees and strives a culture of mutual respect.

## 2. Environment and sustainability

We place high priority on environmental protection and sustainability. HUBER+SUHNER is committed to the pursuit of environmentally sound business activities. We use natural resources carefully. We neither develop nor market any products that may pose a potential hazard. We use systematic quality and environmental management to ensure adherence to all applicable international standards.

## 3. Business practices

### 3.1 Compliance with legal regulations

HUBER+SUHNER adheres to all legal regulations and national and international standards of the countries in which it operates. Infringement of laws must be avoided under all circumstances.

### 3.2 Information policy, accounting , insider trading

HUBER+SUHNER informs its employees, shareholders, the media and financial analysts as well as other target groups in a comprehensive and transparent manner and on the basis of the principle of equal treatment. Employees are prevented from pursuing illegal insider trading. HUBER+SUHNER has strict guidelines for the dissemination of sensitive information, which includes financial data, business development and changes to key personnel. The accounts, the annual financial statements and all other financial information are prepared in compliance with the relevant legal provisions and statutes. Strict adherence to accounting rules and selected accounting principles and standards shall be maintained.

### 3.3 Bribes, gifts, favors and anti-money laundering rules

HUBER+SUHNER requires all its employees at all times not to directly or indirectly offer, promise, grant, accept, tolerate, knowingly benefit from or demand any bribes or other improper advantages to government officials or private commercial business partners and counterparties.

HUBER+SUHNER employees shall not accept or offer any gifts or favors that might be construed as exerting an influence. If it is customary in a cultural environment to exchange gifts, these shall be of a symbolic nature only. Meals and entertainments shall be reasonable in value and consistent with local customs and practices. No favors, gifts and entertainments shall be offered, promised or granted if it could be reasonably understood as an effort to improperly influence government officials or private commercial business partners and counterparties. Entertainments at the invitation of business partners lasting more than one day or that require excessive travelling are usually considered improper.

We do not facilitate money laundering. We entertain business relationships with reputable business partners, which are involved in lawful business activities and whose funds are derived from legitimate sources. All employees are requested to watch out for warning signals, which may include business partners that are reluctant to provide complete information or wish to pay in cash.

### 3.4 Contributions

Any contribution and donation shall be legitimate, for a justifiable purpose, transparent and well documented.

### 3.5 Fair Competition and anti-trust laws

HUBER+SUHNER promotes fair competition among market participants within the framework of applicable competition laws and ensures equitable treatment of their partners and customers.

Employees may not

- exchange data on prices and other sales conditions, production costs, sales quantities or other sensitive parameters which may determine or influence companies' competitive behavior
- agree with competitors to exclude other potential competitors from the market or agree to boycott or refuse to deal with certain suppliers or competitors
- influence resale prices of HUBER+SUHNER products
- obtain sensitive information about a competitor, through theft, bribery or communication of false or truncated information or otherwise engaging in illegal or illicit activities within a view to obtaining a competitive advantage.

### **3.6 Conflict of interests**

Conflict of interests can arise where personal or family interests and other allegiances are at odds with the interests of HUBER+SUHNER. All employees have the duty to ensure that their own direct or indirect personal interests do not interfere with those of HUBER+SUHNER. Apparent, potential and existing interests shall be duly disclosed to the line managers in order to enable HUBER+SUHNER to best resolve the situation in a fair and transparent manner.

### **3.7 Trade compliance**

HUBER+SUHNER complies with applicable export controls and customs laws and regulations as well as applicable trade restrictions and embargoes and does not support any circumvention of such laws and regulations.

### **3.8 Intellectual property and confidentiality**

HUBER+SUHNER treats its intellectual property with the utmost care. The same care shall be applied to the intellectual property of business partners. Employees shall not pass on any confidential information to outside persons, even after they have left the company. Information of business partners shall be protected. Access to such information shall be limited to employees who require the information for transacting business.

## **4. Relationships with business partners and public authorities**

### **4.1 Customers and suppliers**

Our employees shall honor the ethical principles described herein, also in their dealings with third-party companies. We reject ethically improper business transactions. Special care is required when selecting HUBER+SUHNER representatives, e.g. distributors, agents, brokers and service providers as well as its suppliers. All employees shall ensure the faithful application and integration of these principles into any contracts or other agreements concluded with business partners.

### **4.2 Authorities**

HUBER+SUHNER is active in various countries and values good relations with various governments and public authorities. In its interactions with authorities HUBER+SUHNER employees shall be truthful and accurate.

## 5. Enforcement of the principles

### 5.1 Applicability, contact partners

This Business and Ethics Code is binding upon all HUBER+SUHNER officers, managers and employees and shall form part of their employment contracts. All officers and managers are responsible for exercising due diligence to ensure that their direct and indirect reports comply with the rules of this code.

All employees are required to report any suspected infringement of law, of this code or of HUBER+SUHNER policies. Any queries concerning these principles, or reports on their infringement, shall be addressed to line managers, to the Human Resources department or to the Compliance Helpline (+41 44 952 26 02) as set forth in the HUBER+SUHNER Compliance Program.

Employees reporting an infringement in good faith shall not have to expect any negative consequences. Such reports shall be treated with the appropriate confidentiality and anonymity.

### 5.2 Punishment of infringements

Violations of these principles shall be punished by a reprimand or, in serious cases, by dismissal. Violation of laws may result in criminal prosecution.

### 5.3 Communication, training

These principles are publicly accessible via the Internet and are also published on the company Intranet. New employees are instructed about the principles by the respective Human Resources department when joining the company, during the terms of their employment with HUBER+SUHNER and during training sessions. The Compliance Organization of HUBER+SUHNER ensures and monitors the implementation of this code.

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HUBER+SUHNER is certified according to EN(AS) 9100, ISO 9001, ISO 14001, ISO/TS 16949 and IRIS.

**Waiver**

Fact and figures herein are for information only and do not represent any warranty of any kind.