HUBER+SUHNER

Code of Conduct

HUBER+SUHNER

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The responsible way of doing business

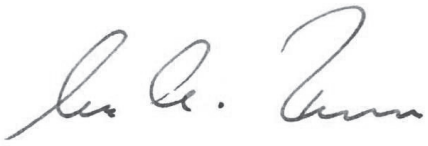
To be successful in today's business environment we must strive to grow our business profitably and, at the same time, make sure that we comply with all applicable laws and regulations in each country we operate in as well as with recognised international standards. We should also run our business in an environmentally and socially responsible manner. This means that we should not base our decisions on economic considerations alone but should also take social and environmental aspects into account and we should always be transparent in our decisions and take responsibility for their impacts.

Conducting our business responsibly means, in short, that we should always live up to our values, respect human rights, use resources efficiently, behave ethically, be honest and reliable, care for the health and safety of our employees, and contribute to the development of the communities around our sites.

This Code lays out important guidelines on how we conduct our business in a responsible manner. We expect every officer, manager and employee of the HUBER+SUHNER Group to live up to the Code. In addition, we expect all our managers to lead by example in this respect.

Furthermore, we expect our suppliers and distributors to conduct their business in accordance with this "Code of Conduct" and will take this into account in the selection process of new partners.

Herisau/Pfäffikon ZH in October 2025



Urs Ryffel, Chief Executive Officer, on behalf of the Executive Group Management

I. Legal compliance as a prerequisite

HUBER+SUHNER complies with all applicable laws and regulations of each country it operates in, as well as with broadly accepted international standards. Legal infringements must be avoided under all circumstances and will not be tolerated.

II. Human rights and labour practices

HUBER+SUHNER fully respects human rights within its sphere of influence. In particular, the company is committed to the following:

A. Equal and non-discriminatory treatment, protection against harassment, open dialogue
HUBER+SUHNER ensures equal opportunity and treatment for all employees in order to prevent discrimination on the basis of ethnic group, colour, gender, language, religion, political or other opinion, national or social origin, property, birth or other status, as well as membership in a trade union, sexual orientation, disability or age. Recruitment shall be based solely on personal and professional qualification, suitability and performance.

The company protects its employees against harassment in the workplace, in particular against any kind of sexual, physical or psychological abuse.

HUBER+SUHNER encourages an open dialogue between its managers and employees based on mutual trust and respect.

Grievances regarding human rights violations, unequal treatment or harassment at work are dealt with in a low-threshold, structured procedure, which can be conducted anonymously if desired.

B. Zero tolerance of forced and child labour
HUBER+SUHNER does not tolerate any form of forced or compulsory labour. The company does not engage in any form of child labour or benefit from the use of child labour within its sphere of influence.

C. Occupational health and safety
The health and safety of employees have top priority at HUBER+SUHNER. The company ensures a safe and healthy working environment by complying with applicable laws and regulations, monitoring work processes and regularly identifying associated hazards and assessing risks and opportunities. The measures derived from these evaluations serve to eliminate hazards and minimise risks.

D. Compensation and working hours
HUBER+SUHNER provides wages in accordance with national laws, or collective labour agreements. In the absence of such regulations, the company pays wages at least adequate for the needs of employees and their families taking into account the general level of wages and the cost of living in the country. Special consideration shall be given to equal pay for work of equal value.

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 labour laws and regulations. HUBER+SUHNER encourages employees to maintain a good work-life balance and supports them with appropriate measures.

E. Trade unions and collective bargaining
HUBER+SUHNER employees have the right to join a trade union of their choice within the framework of the applicable laws. HUBER+SUHNER Group companies have the choice to join collective bargaining in countries where this is common practice.

F. Privacy
HUBER+SUHNER respects the privacy of its employees and protects their personal data in the best possible way and in compliance with applicable privacy and data protection laws. Personal data of employees are only collected and retained if required for effective business purposes or if it is required to comply with legal regulations.

III. The environment

HUBER+SUHNER is committed to protecting the environment and to contributing to keeping global warming below 1.5 degrees. The company uses resources like energy, water and materials sustainably and efficiently. It determines its environmental impact and greenhouse gas emissions annually. Based on the results of this analysis HUBER+SUHNER defines actions with the aim of continually reducing the intensity of its resource consumption, waste generation as well as emissions of greenhouse gases and other pollutants.

IV. Fair operating practices

A. Bribes, gifts, favours, anti-money laundering rules, and conflicts of interest
HUBER+SUHNER requires all employees never to directly or indirectly offer, promise or grant public officials or private business or contractual partners any bribes or improper advantages, or to receive, tolerate, knowingly benefit from or accept such bribery or improper advantage.

HUBER+SUHNER employees may not accept or provide gifts or favours that could be considered as improper influence. If the exchange of gifts is customary in a cultural area, they may only be of a symbolic nature. The value of meals and entertainment must be within a reasonable and appropriate range and must be in accordance with local customs and traditions. Favours, gifts and entertainment may not be offered, promised or granted if this could be construed as an attempt to improperly influence public officials or private business or contractual partners. As a general rule, offers of entertainment at the invitation of business partners are considered improper if they last longer than one day or require excessive travel.

HUBER+SUHNER does not support money laundering in any way. The company maintains business relationships with recognised business partners who conduct legitimate business and whose funds come from legitimate sources. All employees are required to look out for specific warning signals. These may include the refusal of business partners to provide complete information or their desire to pay cash.

Conflicts of interest may arise whenever personal interests, family or other ties conflict with the interests of HUBER+SUHNER. All employees are obliged to ensure that the interests of HUBER+SUHNER are not affected by their own direct or indirect personal interests. Potential or existing interests must be duly reported to the respective superiors so that HUBER+SUHNER can resolve the matter in a fair and transparent manner.

B. Fair competition and antitrust law
HUBER+SUHNER supports fair competition between market participants within the framework of the applicable competition rules and ensures equal treatment of business partners and customers.

Employees are not permitted to:
- provide information on prices and other conditions of sale, on production costs, sales volumes or any other sensitive data which may determine or influence the competitive behaviour of enterprises outside the ordinary sales interaction with customers,
- enter into agreements with competitors to exclude other potential competitors from the market or boycott or refuse to do business with certain suppliers or competitors,
- influence the prices of HUBER+SUHNER products at the point of resale, or
- obtain sensitive information about competitors by theft, bribery or transmission of false or falsified data, or by any other illegal act, in order to gain a competitive advantage.

C. Trade compliance
HUBER+SUHNER shall comply with all applicable government export control and customs regulations as well as trade restrictions and embargoes and shall not facilitate the bypassing of such regulations.

D. Promoting social responsibility in the value chain
HUBER+SUHNER encourages its suppliers and distributors to include ethical, social, environmental and human rights criteria as well as occupational health and safety in both their business conduct and decision making, and to establish appropriate policies. HUBER+SUHNER includes such corporate social responsibility criteria in its supplier audits and in its due diligence when selecting new business partners.

E. Intellectual property and confidentiality
HUBER+SUHNER respects the intellectual property rights of business partners and competitors alike. The company does not engage in activities that violate property rights, counterfeiting or piracy. Employees shall protect any confidential information of the company's business partners. Access to such information shall be limited to employees who need the information to perform their tasks.

F. Information policy, accounting, insider trading
HUBER+SUHNER informs its employees, shareholders, the media and financial analysts, as well as other target groups, on issues that may be share price relevant in a comprehensive and transparent manner and according to the principle of equal treatment. HUBER+SUHNER has strict guidelines for the dissemination of sensitive information, which includes financial data, business development information and changes to key personnel. Employees are prevented from pursuing illegal insider trading.

Company accounts, financial statements and all other financial information are prepared in compliance with the relevant legal provisions and statutes. Strict adherence to accounting rules and the selected accounting principles and standards shall be maintained.

G. Responsible political involvement
HUBER+SUHNER strives for good relationships with local governments and public authorities. In interactions with authorities HUBER+SUHNER employees shall be truthful and accurate.

Any political contribution shall be legitimate, transparent and well documented. It shall not amount to an attempt to control or be perceived as exerting undue influence on politicians and policy makers.

V. Community involvement and development

HUBER+SUHNER encourages all Group companies to be involved in the communities around their sites. Such involvement includes but is not limited to:

- consulting representative community groups in determining priorities for social investment and development activities,
- contributing to social, cultural or educational projects,
- encouraging employees to volunteer in such projects, and
- maintaining transparent relationships with local government officials and political representatives, free from bribery and improper influence.

VI. Enforcement of the principles

A. Applicability, contact partners
This Code of Conduct is binding upon all officers, managers and employees of HUBER+SUHNER Group companies and shall form part of their employment contracts. All officers and managers are responsible for the exercise of 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 violation of law, of this code or of HUBER+SUHNER policies. Any queries concerning these principles, or reports on their violation, shall be addressed to line managers, to the local human resources department or to the Compliance Helpline as set forth in the HUBER+SUHNER Compliance Programme.

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

B. Sanctioning of infringements
Violations of the principles set out here are sanctioned with a reprimand or, in serious cases, with dismissal. Violations of the applicable legislation may result in criminal prosecution.

C. Accessibility and training
These principles are publicly accessible via the Internet and can also be viewed on the company's intranet. Employees are informed of these principles by the respective human resources department when joining the company and regularly thereafter through special training courses. The implementation of this Code is ensured and monitored by the HUBER+SUHNER compliance organisation.

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HUBER+SUHNER is certified to ISO 9001, ISO 14001, IATF 16949 and IRIS.