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Foreword

The Cicor Group is a global company with a unique technology and service portfolio. Our objective is to create added value for our customers, shareholders and employees. In this way we aim to be a reliable, fair and environmentally-conscious business partner and employer. We take our responsibility towards society and the environment seriously in carrying out our business activities.

This Code of Conduct sets out what this means in terms of working conditions, social and environmental sustainability, as well as transparency, cooperation that inspires trust, and maintaining a dialogue. The Code of Conduct serves as a guideline on social responsibility for all employees of the Cicor Group and forms the basis for our daily work. The Code of Conduct underlines our efforts to be an exemplary, reliable and fair business partner and employer at all times.

Our Code of Conduct is based on the "ZVEI Code of Conduct for Corporate Social Responsibility (ZVEI – German Electrical and Electronic Manufacturers' Association, Frankfurt am Main, Germany).

1 Scope

The Cicor Code of Conduct applies to all subsidiaries and business units of the Group worldwide. We are committed

to promoting adherence to the content of this Code of

Conduct in all areas of work, among our suppliers and

in the wider value chain.

2 The cornerstones of socially responsible company management

By signing the Cicor Code of Conduct, we are obliged to ensure that the values mentioned below are always put

into practice and adhered to.

2.1 Upholding the law

We abide by the applicable laws and the other legal requirements of the countries in which we are present. In countries with a weak institutional framework, we give careful consideration to the good company practices from Switzerland that should be applied to ensure supportive and responsible company management.

2.1.1 Insider trading

All Cicor Group employees are obliged to adhere to the laws on insider trading. Confidential information must not be used as the basis for share trading and must not be passed on.

2.2 Integrity and organizational governance

2.2.1 Values and principles

We are committed to ensuring that our activities are in line with generally accepted ethical values and principles, particularly integrity, honesty, respect for human dignity, openness and non-discrimination, based on religion, world view, gender and ethnicity.

2.2.2 Corruption and bribery

We reject corruption and bribery as stated in the United

Nations Convention against Corruption. We use suitable means to promote transparency, trading with integrity, responsible management and corporate accountability.

2.2.2.1 Granting or accepting an undue advantage The employees of the Cicor Group are obliged to adhere to all laws and internal guidelines on bribery. Cicor employees are prohibited from promising, offering and giving bribes or other advantages to public officials or employees of private companies. Employees are likewise prohibited from accepting bribes and other advantages.

2.2.2.2 Gifts

It is not in the interests of the Cicor Group for employees to accept or give gifts. In cases of doubt, management must always be contacted in advance. In some countries, the custom is to exchange gifts. In this event, laws must not be violated under any circumstances, and a relationship of dependency must not be established when giving or accepting gifts. The value of a gift must therefore not exceed CHF 100.–, adjusted to the local pur

chasing power. Employees who regularly receive gifts as part of their role, or who cannot decline impermissible gifts for cultural reasons, must submit these gifts to Cicor, and these will subsequently be shared among employees. The giver of the gift must be informed about this rule. The giving or receiving of cash or objects of value is not permitted.

2.2.2.3 Invitations

Similar rules apply to invitations: Invitations must be deemed to be reasonable, and must not result in a relationship of dependency being established. Invitations may be extended and accepted to the following events, provided

the costs are in proportion to the event:

- Lunch or dinner with Cicor business partners.
- Company events such as open days, company anniversaries or customer events.

Travel or events that require an overnight stay are not appropriate. Should there be any deviation from this rule approval must be obtained in advance from management.

2.2.2.4 Government officials

Special care is required when dealing with government officials. They may be offered or promised neither gifts nor invitations. However, in cases that justify an exception,

this must be approved in advance by management.

2.2.3 Fair competition

We are committed to engaging in clean and recognized business practices and fair competition. With regard to

competition, the emphasis is on professional behavior

and high standards of quality. We foster partnership and trust when dealing with supervisory authorities.

2.2.4 Information

Cicor employees are obliged to work responsibly with modern information technology. Employees must exercise special care when sending important information and

documents electronically and must also be aware of shortcomings in security. Operational and business secrets must not be disclosed to unauthorized internal or external third parties. This also applies without any restrictions after the termination of the employment relationship.

2.2.5 Conflicts of interest

We expect our employees to avoid situations that could lead to conflicts of interest. These can be avoided by establishing the required level of transparency. In the event of a potential conflict of interest, management or the HR department must be informed so that Cicor can decide whether this constitutes a conflict of interest and how the situation can be resolved.

2.3 Consumer interests

Insofar as consumer interests are affected, we abide by regulations that protect the consumer, as well as the

appropriate sales, marketing and information practices

We pay particularly attention to groups requiring special protection (e.g. minors).

2.4 Communication

We communicate in an open manner and welcome discussion about the requirements of our Code of Conduct and its implementation with employees, clients, suppliers and other stakeholders. We are obliged to produce all documents and information. These will not be unfairly altered or destroyed and will be properly stored. Company secrets and the business information of our partners will be handled sensitively and confidentially.

2.5 Human rights

We are committed to promoting human rights. We uphold human rights according to the United Nations Declaration

of Human Rights, especially the following:

2.5.1 Privacy

Protection of privacy.

2.5.2 Health and safety

Ensuring health and safety at work, guaranteeing a safe and healthy working environment to avoid accidents and injuries in particular.

2.5.3 Harassment

Protecting employees against corporal punishment and against physical, sexual, psychological or verbal harassment and abuse.

2.5.4 Freedom of opinion

Protecting and guaranteeing the right to the freedom of opinion expression.

2.6 Working conditions

We abide by the following core work standards from the International Labor Organization:

2.6.1 Child labor

Prohibiting child labor, i.e. employing persons under the age of 15 years, provided the local legal requirements do not specify a higher age limit and insofar as no exceptions are permitted.

2.6.2 Forced labor

Prohibiting forced labor of any kind.

2.6.3 Remuneration

Working standards with regard to pay, especially in terms of the level of pay as stated in the applicable laws and regulations.

2.6.4 Employee rights

Respecting the rights of the employee to the freedom of association, the freedom of assembly and collective bargaining, as long as this is legally permissible and possible in the respective country.

2.6.5 Non-discrimination principle

All employees are to be treated in a non-discriminatory fashion.

2.6.6 Working time

We abide by employment standards regarding the maximum permissible working hours.

2.7 Environmental protection

We are committed to fulfilling the regulations and standards for environmental protection with regard to our operations, and we act in an environmentally-conscious way at all our sites. Furthermore, we handle natural resources in a responsible manner in accordance with the principles of the Rio Declaration

2.8 Civic commitment

We contribute to the social and economic development of the countries and regions in which we operate, and promote the appropriate volunteering activities among our employees.

3 Implementation and application

We undertake to make every appropriate and reasonable effort to continuously implement and apply the principles and values described in this Code of Conduct. We will inform contractual partners about the basic measures upon request, and within the scope of reciprocal cooperation, so that the way in which we guarantee adherence to these measures in principle can be observed. There is no entitlement to pass on operational or business secrets or any other information that requires protection or which relates to competitors.



4 Confirmation of receipt

The Code of Conduct is binding for all employees of the Cicor Group and must be adhered to at all times.

I hereby certify that I have received, understand and will comply with the Code of Conduct:

Surname I first name		
Role in the company		
Place I date		
Signature		

Should you have any questions, please contact management or the HR department of your respective location.



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