



Code of conduct for suppliers of the Competec Group

Preamble

As a leading e-commerce and trading company, the Competec Group understands the special role it plays as an intermediary between manufacturers, suppliers and consumers. With this in mind, the Competec Group is committed to environmentally and socially responsible corporate governance and, in particular, to respecting human rights. To do this, we reconcile ecological, economic and social objectives to exercise our responsibility in society. The Competec Group also expects its suppliers to comply with these principles.

This code of conduct for the Competec Group ("CoC" for short) provides the cornerstone for the effective joint implementation of these principles. The CoC defines the minimum standards for complying with corporate due diligence requirements in the supply chain, which suppliers must keep in mind and observe when conducting business with companies of the Competec Group. The following companies constitute companies of the Competec Group within this code of conduct: Alltron AG, Brack.ch AG, Competec Logistik AG, Medidor AG, Jamei AG, Furber AG and Competec Service AG. These companies are not mentioned again below but are covered explicitly by the code of conduct.

The subsequent requirements are essentially based on international standards, such as the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and applicable Conventions of the International Labour Organization (ILO), as well as the legislation of the country in question.

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CEO Competec Group

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1. Applicability of the code of conduct, abidance with laws, obligation to provide evidence

For the purposes of this code of conduct, suppliers are all third parties that operate for, on behalf of or jointly with the Competec Group or a subsidiary. Such suppliers are expected to comply with all standards and requirements listed in this code of conduct. By issuing a code of conduct, the Competec Group intends to ensure that the values and expectations contained therein are observed along the entire supply chain. To achieve the greatest possible trust and transparency, every supplier of the Competec Group is obligated to provide evidence (in the form of appropriate documentation and written confirmation) that it and its suppliers observe the requirements of this code of conduct.

2. Health and safety

It is the responsibility of the supplier to ensure a safe and healthy working environment in accordance with the labour law regulations at the place of employment.

The supplier must take appropriate measures to prevent accidents and work-related damage to health in connection with the work performed. These include defining and implementing safety standards and protective measures to identify, avoid and remedy potential hazards to the health and safety of employees. It is also important to ensure that the employees regularly receive information and training on applicable health protection and safety standards as well as safety measures. All such measures should be documented by the supplier.

3. The environment and climate protection

The supplier must comply with all applicable national and international environmental laws and ensure that it obtains the applicable approvals and registrations at all times. The supplier recognises that environmental responsibility is important, uses resources sparingly and ensures that its impact on the environment is as low as possible. It commits to develop, put in place and observe environmentally aware practices.

The supplier is expected to handle natural resources sparingly and, wherever possible, to switch to using renewable energy sources.

We expect our supplier to actively champion the protection and conservation of our natural resources. This includes avoiding harmful soil changes, air pollution, water pollution, harmful noise emissions and excessive water consumption. In addition, the supplier must ensure that all activities do not endanger the health of people, do not impair

or prevent access to clean drinking water and sanitary facilities, and do not significantly compromise the natural foundations for food production. Wherever possible, any waste that occurs should be recycled or avoided.

Biodiversity plays the vital role of providing the basis on which ecosystems function and is therefore essential for the survival and wellbeing of all living things, including humans. Our supplier is therefore obligated to protect and preserve biodiversity by promoting sustainable practices and prioritising the use of environmentally friendly materials and resources.

4. Bribery and corruption

The Competec Group does not tolerate bribery or corruption in any form whatsoever.

The supplier must not promise or offer anything of value to influence the actions or decisions of Competec and any of its subsidiaries.

The supplier is expected to put in place anti-bribery and anti-corruption guidelines in all areas of its business. If gifts are accepted in a certain country in accordance with local customs and rules of courtesy, it must be ensured that no binding dependencies arise as a result and the legal provisions applicable in the country in question must be observed.

5. Child labour

It is forbidden to employ persons under 15 years of age – either directly or indirectly – unless recognised exceptions exist in accordance with the provisions of the ILO. Children and young people are to be protected against economic exploitation, hazardous work, harm to their education and risks to their health and physical, mental, spiritual, moral or social development.

6. Payment and benefits

The supplier is obligated to ensure that its employees are paid an appropriate wage that at least corresponds to the statutory, collectively agreed or standard industry minimum wage, as applicable. If statutory, collectively agreed or standard industry minimum wages do not exist at the place of employment, the supplier must ensure that the wage paid essentially meets the basic needs of the employees and takes into account individual circumstances (such as secondary income or part-time work).

7. Discrimination

It is strictly forbidden to permit any form of discrimination with respect to recruitment, employment and payment of wages. In particular, any kind of discrimination on the grounds of nationality, ethnic origin, social background, state of health, disability, sexual orientation, age, gender, political opinion, religion or ideology, skin colour, membership of a labour organisation or other personal characteristics is forbidden unless it is justified due to the demands of the work.

8. Bonded labour, forced labour or human trafficking

The Competec Group does not tolerate any form of slavery, forced labour, bonded labour, compulsory labour, human trafficking or involuntary work, including state-imposed forced labour. All employees are to be treated with dignity and respect and no one must be subjected to verbal, psychological, physical and/or sexual violence, abuse or harassment.

9. Sanctions, trade embargoes and export controls

Our supplier complies with sanctions, trade embargoes and export controls imposed on it by all states in which it operates. In the case of such restrictions, it must not conduct any business with certain countries, companies or individuals in order to sell goods and services to us. Furthermore, our supplier shall follow the export control provisions that prohibit or restrict the export or re-export of certain goods, services and technologies. This also includes the brokering of (re)insurance that facilitates export or re-export.

10. Data protection & data security

Data protection is a top priority for our supplier: it implements the requirements of the General Data Protection Regulation (GDPR) and the Swiss Data Protection Act (FADP) – to the extent these apply to it – as well as the applicable national laws in an exemplary manner and follows the principles of privacy by design and privacy by default.

The supplier pays attention to compliance with the very latest standards regarding data security and only engages processors that meet the same requirements and have provided the supplier with appropriate assurance of this. Associated IT solutions and components are in line with the state of the art and good practice and their software is always kept up to date. At the same time, access to data is granted in accordance with the principle of least privilege and the need-to-know principle. Our supplier within the

European Economic Area (EEA) avoids the transmission of personal data outside of the EEA, wherever possible.

11. Intellectual property, trade and company secrets

Our supplier respects the intellectual property, including all trade and company secrets of third parties (irrespective of whether these are identified as such). In particular, our supplier takes care not to infringe any intellectual property rights and copyrights of third parties.

12. Inspection of compliance with the code of conduct

The supplier assures that compliance with the principles of this code of conduct may be inspected by the Competec Group itself or by an independent third party it has authorised, either at its work premises or at the work premises of its suppliers as necessary (suppliers or service providers, including subcontractors). The supplier shall name the relevant work premises.

In the event that breaches of the code of conduct are identified, the supplier shall introduce appropriate corrective action without delay, which will be documented by the auditor in a corrective action plan, and must implement such action within an appropriate period of time. The supplier is also obligated – at the request of the Competec Group – to share evidence regarding the implementation of the corrective action.

13. Implementation

The supplier of the Competec Group is expected to make all reasonable efforts to communicate and implement the code of conduct appropriately.

COMPETEC

Acknowledgement and agreement of the supplier

By signing this document, the supplier agrees to conduct itself responsibly and to comply with the principles/requirements listed.

Company

Vendor number (internal to Competec)

Last name First name

Last name First name

Role

Role

Place Date

Place Date

Signature

Signature

Revision control

Responsible department: Process and Supply Management

Revision interval: 12 months

Date	Created/changed by	Department	Valid from
27 April 2023	Patrick Itel	Process and Supply Management	01 May 2023
17 July 2023	Patrick Itel	Process and Supply Management	01 August 2023