



SUPPLIER CODE OF CONDUCT

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CODE OF CONDUCT FOR SUPPLIERS OF THE HOCHDORF GROUP

HOCHDORF processes and produces high quality raw materials, semi-finished products and finished products and attaches great importance to acting in accordance with the law, adhering to the principles of integrity, loyalty and sincerity.

HOCHDORF expects its business partners to join HOCHDORF in promoting responsible and ethical conduct and to act in accordance with these principles both, in their relationship with HOCHDORF and in their dealings with other customers, suppliers, employees and the public.

This Supplier Code of Conduct is aimed at contributing to the achievement of this aspiration. It is binding for all suppliers of HOCHDORF and can be downloaded from the HOCHDORF website.

1. 1. Integrity in the Business Environment

1.1 The suppliers of HOCHDORF comply with applicable national and international law

HOCHDORF is committed to compliance with legal requirements, regulatory standards and codes recognized by HOCHDORF.

HOCHDORF expects its suppliers to be familiar with the laws, regulations, industry standards and guidelines relevant to their activities and to comply with local, national and international laws and standards.

The suppliers of HOCHDORF ensure in particular that they have all of the permits, certifications and credentials necessary for their activities.

1.2 The suppliers of HOCHDORF respect foreign trade requirements

HOCHDORF complies with applicable sanctions and acts in line with foreign trade requirements.

HOCHDORF expects its suppliers to comply with applicable foreign trade requirements.

The suppliers of HOCHDORF ensure in particular that they do not violate applicable economic embargoes, sanctions, trade, import, and export control regulations or regulations to combat terrorist financing.

1.3 The suppliers of HOCHDORF recognize the basic principle of fair competition and comply with applicable competition law

HOCHDORF stands for a free-market economy and fair competition as the basic principle of a free economy.

HOCHDORF expects that the actions of its suppliers comply with the applicable antitrust and competition law and with other national and international regulations governing competition.

The suppliers of HOCHDORF in particular refrain from inadmissible agreements with competitors and from other unlawful conduct that restricts competition. Particularly, the suppliers of HOCHDORF do not enter into inadmissible agreements with competitors concerning prices or the allocation of markets, territories or clients and do not exchange any legally prohibited information with competitors.

1.4 The suppliers of HOCHDORF do not tolerate bribery, corruption, and the granting of advantages

HOCHDORF takes organizational precautions to prevent acts of corruption.

HOCHDORF expects its suppliers not to tolerate bribery, corruption and the grant or acceptance of advantages and to organize themselves accordingly to prevent such acts in the business environment or in their relationship with public officials.

The suppliers of HOCHDORF ensure in particular that any advantages (for example invitations, donations, sponsoring etc.) comply with the legal requirements.

1.5 The suppliers of HOCHDORF avoid conflicts of interest and are committed to full transparency in this regard

HOCHDORF attaches great importance to transparency and independence in business relationships and consequently avoids any kind of conflict of interest.

HOCHDORF expects its suppliers to investigate and avoid conflicts of interest.

The suppliers of HOCHDORF ensure that they discover actual or potential conflicts of interest in connection with their business relationship with HOCHDORF and, upon discovery, disclose them immediately and cooperate with HOCHDORF to resolve the conflict.

1.6 The suppliers of HOCHDORF comply with applicable data protection law

HOCHDORF processes personal data with utmost diligence and caution and collects such data only with reservation. In any case, HOCHDORF complies with the applicable data protection laws.

HOCHDORF requests that its suppliers apply the necessary caution and diligence in the processing of personal data.

The suppliers of HOCHDORF undertake in particular to comply with national and international regulations concerning data protection.

1.7 The suppliers of HOCHDORF protect confidential information and respect intellectual property

Trade secrets and intellectual property rights are the result of research and development as well as of investments. They therefore constitute a valuable asset for HOCHDORF. HOCHDORF attaches importance to the protection of trade secrets as well as of its own intellectual property and respects the intellectual property of third parties.

HOCHDORF requests that its suppliers respect trade secrets and the intellectual property of HOCHDORF and of third parties.

The suppliers of HOCHDORF particularly ensure that confidential information and any kind of data in connection with the business relationship with HOCHDORF are treated with the utmost care, kept safe, not disclosed to unauthorized third parties and used exclusively for the purpose and to the extent agreed with HOCHDORF.

1.8 The suppliers of HOCHDORF comply with applicable laws when dealing with insider information

HOCHDORF is listed on the Swiss stock exchange SIX and is therefore under a particularly strict obligation to ensure that information is handled with care, whereby the highest security standards apply to insider information. Insider information is information that is not accessible to the general public and that an investor would consider relevant as a basis for his/her investment decisions when trading in securities.

HOCHDORF and the applicable law prohibit persons who possess inside information from trading in securities or in other financial instruments and from disclosing such information to third parties.

The suppliers of HOCHDORF comply with those strict regulations concerning insider trading in all cases.



2. Human Rights and Social Standards

2.1 The suppliers of HOCHDORF respect and protect the universally accepted human rights

HOCHDORF respects and promotes the protection of the universally accepted human rights.

HOCHDORF expects its suppliers to safeguard the human rights.

The suppliers of HOCHDORF organize themselves in such a way that they identify and prevent possible human rights violations in their own company or in supplier companies.

2.2 The suppliers of HOCHDORF do not tolerate child, forced or compulsory labor

HOCHDORF supports and promotes the fundamental principles and core labor standards of the International Labor Organization (ILO) and rejects any form of child, forced or compulsory labor. HOCHDORF supports the minimum age for admission to employment recommended by the ILO, which must not be less than the age at which compulsory education is completed in the country concerned and, in addition, must not be less than 15 years of age. HOCHDORF supports the view that the choice of employment should be made freely and must be free of any threats to the worker.

HOCHDORF requires that its suppliers support and safeguard the fundamental principles and core labor standards of the ILO.

The suppliers of HOCHDORF do neither tolerate child labor, nor forced or compulsory labor of any kind. The suppliers of HOCHDORF acknowledge in particular that the choice to enter into or to terminate an employment relationship must be made freely.

2.3 The suppliers of HOCHDORF tolerate neither discrimination nor harassment

HOCHDORF does not tolerate discrimination, harassment, intimidation, bullying or coercion. This includes, in particular, discrimination or harassment of persons on the basis of ethnicity, skin color, religion, disability, gender, sexual orientation, age or nationality.

HOCHDORF requires that its suppliers take strong action against any discrimination, harassment, intimidation, bullying or coercion in the workplace.

2.4 The suppliers of HOCHDORF ensure a legally compliant, healthy and safe working environment

Good working conditions are of great importance to HOCHDORF.

HOCHDORF therefore requires its suppliers to comply with applicable labor and social security laws, in particular regarding working hours, health and safety at work, and to ensure good working conditions for their employees.

The suppliers of HOCHDORF ensure, among other things, that their employees have the right to join trade unions of their choice.

3. Environment and Quality

3.1 The suppliers of HOCHDORF commit themselves to a responsible treatment of the environment and of the limited resources of nature

To ensure corporate success based on the principle of sustainability, HOCHDORF attaches great importance to the responsible treatment of the environment and of natural resources.

HOCHDORF expects its suppliers to promote environmental and climate protection and to treat nature's limited resources with care.

The suppliers of HOCHDORF in particular comply with local, national and international laws and standards concerning environmental protection and sustainability.

3.2 The suppliers of HOCHDORF ensure the safety and quality of the products supplied to HOCHDORF

HOCHDORF is committed to the highest standards of safety and quality for its products.

HOCHDORF requires that its suppliers ensure the highest safety and quality of the products they supply.

The suppliers of HOCHDORF comply in particular with the statutory quality and safety regulations and any quality and safety requirements of HOCHDORF.

IMPLEMENTATION / COMPLIANCE

The suppliers of HOCHDORF guarantee that they comply with the minimum standards of this Code of Conduct in their business activities. They shall pass on this Code of Conduct to their employees and/or partners carrying out work for HOCHDORF and ensure compliance with it.

