

Purpose

The purpose of this policy is to inform and raise awareness of this Code of Conduct among all Polycontact AG employees or persons working for or on behalf of Polycontact AG. Compliance with this guideline is to be understood as obligatory, and we also rely on the conscious application of common sense!

Code of Conduct for Procurement

Employees take responsibility for their actions and show consideration for people, society, and the environment. They comply with the law and all other external and internal regulations and act with integrity. These are the basic values of the Polycontact AG Code of Conduct, which also apply to procurement. The employees of Polycontact AG ensure that our understanding of values and the principles of this guideline form the basis for cooperation with supply partners.

The separation of powers and the four-eyes principle are the foundation for the procurement processes of Polycontact AG. These are open, transparent, and take the aspects of quality, environment & social issues, safety, legal compliance, as well as technical and commercial requirements into account. In our procurement operations, we act with good faith and confirm the trust placed in us by our partners.

Personal Conduct:

We operate in a professional manner and are guided by common sense. We treat each other with respect and interact fairly at all times. We act in good faith and thus justify the trust placed in us. This is accomplished in an environmentally conscious, safety-conscious, social manner and we do not accept any kind of discrimination. We reject dubious business practices and disclose them internally. We respect individual and cultural diversity.

Anti-corruption:

As part of a zero-tolerance strategy against bribery and corruption, Polycontact AG relies on the following mandatory principles within the company:

- Donation payments related to obtaining improper business advantages are prohibited, including acceleration payments.
- Both giving or receiving bribes (e.g., personal benefits from improper business advantages) and acceleration payments in the form of money or other items of value (regardless of whether they are customary in certain countries) to government officials in order to expedite routine government tasks not covered by discretionary authority, are strictly prohibited.
- Accordingly, employees of Polycontact AG may not demand, be promised, or accept gifts, invitations, or other benefits for themselves or a third party. The acceptance of minor and socially customary benefits (e.g., lunch or dinner) is permissible.
- The acceptance of further benefits must be approved in advance by the respective supervisor, considering the above-mentioned principles.

Chur, 06. June 2022



Hanspeter Gauer / CEO



Corsin Schuetz / COO



Thomas Zaugg / CTO