

EXMAR / SERTO Group Code of Conduct

Introduction

As a global company with Swiss roots, we are confronted with a wide variety of laws, conditions and influences. This code of conduct governs how we do our business and interact with one another and our business partners. Rather than providing a list of legal regulations, it addresses the general areas which have a significant impact on the commercial success of SERTO. We believe that every employee at every level will comply with all relevant legislation and rules, even if they are not explicitly mentioned in this code of conduct.

This code of conduct applies alongside internal documents, rules and handbooks. The code of conduct does not include any new requirements. Instead, it simply describes what has been accepted practice at SERTO for some time.

We would like to thank all the employees for their commitment to the values which define SERTO and help us to be sustainable and successful.

Frauenfeld, 15 June 2022

SERTO Group Management

Andreas Mühlthaler Kurt Bolliger Norbert Kern



Principles

The business relationships between the SERTO Group (SERTO) and its partners, clients and suppliers are based on mutual trust and honesty. SERTO is committed to conducting itself responsibly at a global level and ensures that all of its locations meet the minimum requirements for social, ethical and environmentally friendly practices. This code of conduct applies to every employee at every SERTO location, and is the foundation for how we work together with our business partners.



Compliance with the law, prevention of corruption and bribery

Every employee must comply with the laws of the country in which they work. Regardless of the legal system, no form of corruption (e.g. bribes, kickbacks, offering or accepting favours) or any other illegal or unethical business practices will be tolerated. SERTO expects its employees to immediately report any suspicion of a violation to their superior, a member of the management team or a person in authority that they trust.



Headquarters:

SERTO AG
Langfeldstrasse 117
CH-8500 Frauenfeld
www.serto.com

EXMAR GmbH
Am Taubenbaum 6
D-61231 Bad Nauheim
www.exmar.de

Gifts and invitations

Gifts and invitations may not be accepted if they place an obligation on the recipient. Excessive gifts or offers of preferential treatment for employees or people close to them must also be rejected. Monetary gifts may not be offered or accepted. Gifts, invitations or hospitality may be accepted as long as they are not excessive. The financial value of a gift is dependent on local customs.

If a gift exceeds the normal value for the location but cannot be rejected without violating cultural norms or national customs, the employee may accept the gift as an exception. Such a gift must be reported immediately to management, who will then decide how it will be used. The provider of the gift must be informed of this rule.



Donations

SERTO is an active member of society with high social values. All donations and all other forms of social commitment are voluntary and place no obligation on the recipient.



Data protection, confidentiality and business secrets

The privacy of employees and business partners will be protected at all times. Exclusively data that are required for day-to-day business will be collected and processed. These data will be protected and secured in accordance with the corresponding international and national data protection law. SERTO will never transfer any personal data to third parties outside of the company without permission.

Confidential internal information (e.g. technical data for products, internal purchase price lists, internal financial data and general business secrets) is protected to the same extent and does not belong in the hands of third parties.

Employees are only permitted to access the technical data of customers provided to SERTO as part of a project if they need to do so for business or legal reasons. All data of this kind is also protected and secured to the fullest extent.

IT security helps to protect all data from unauthorised access, theft and malware. This is done using a variety of security features, e.g. passwords, authorisation systems, up-to-date antivirus software, etc.



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Fair competition

Fair competition is important to SERTO. All regulations and legislation designed to ensure fair competition are complied with at all times. We take particular care not to make any agreements with competitors about prices, dividing up sales territories and similar matters. We also do not provide competitors with any information which would affect the competitive situation.

The quality of SERTO products speaks for itself, and we do not provide or publish any misleading information about our products or services.



Export inspections

SERTO is an internationally active company that in its business activities observes regulations that govern and may restrict the free exchange of goods.

Various national and international laws, product-related regulations and personal and country-related sanctions limit or forbid the import and export of certain goods, services, technologies and financial transactions. SERTO follows all legally relevant export inspection regulations.



Suppliers

In addition to economic criteria, new suppliers are selected and existing relationships with suppliers are evaluated on the basis of their commitment to acting in a socially responsible, ethical and environmentally friendly manner. SERTO expects all of its business partners to recognise and comply with all relevant legislation, human rights and workers rights, environmental requirements and the ban on corruption and bribes.



Environmental protection and energy consumption

SERTO is committed to conserving natural resources. All divisions of the company, and in particular Production, Administration and Facility Management have the objective of operating in a sustainable manner and economizing the use of resources including energy. Furthermore, we use electricity that has been produced in a sustainable manner that is either purchased, or produced via our own photovoltaic systems. We also place great value on recycling and disposal of material in an environmentally friendly manner. Operating and auxiliary equipment, raw materials and commodities are regularly checked and are, if possible, replaced by products which have a better environmental balance.

All of our employees are encouraged to deal with resources such as paper, water, electricity and so on in a responsible manner.

SERTO would like to continually improve our own environmental footprint and, among other things, we are implementing an environmental management system in accordance with ISO 14001.



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Fair employment

SERTO guarantees equality of opportunity, equal rights and fair employment at all of its locations. SERTO will never use any form of child labour or forced labour.

SERTO employees are evaluated on the basis of their professional abilities, not on the basis of assumptions or their personality or beliefs. SERTO does not tolerate any form of harassment or discrimination on the basis of race, gender, religion, membership in a trade union or political party, age, marital status, pregnancy, ethnicity, social background, disability or sexual orientation. Any behaviour (including gestures, physical contact and speech) of a sexual, coercive, threatening, abusive or exploitative nature will not be tolerated.

SERTO provides its employees with wages and payments which comply with the law and collectively bargained agreements and which cover their living costs. SERTO does not use pay cuts as a disciplinary measure. Working hours always comply with the limits laid out in national legislation.

SERTO only employs non-adults in voluntary holiday positions while complying with the special requirements governing the employment of minors.

The SERTO management style is based on the principle of support and demand.



Conflicts of interest

SERTO expects its employees to remain loyal and act in the best interests of the company. Personal and family ties or interests can lead to conflicts. Employees are required to avoid situations of this kind or to meet with their direct supervisor to find a solution which is acceptable for all parties.



Occupational health and safety

The health and safety of SERTO's employees play an important role in the success of the company. Measures are implemented to prevent accidents and exposure to health hazards. The company has global internal occupational health and safety guidelines which must be complied with at all times. All accidents and near misses must be reported immediately to the relevant supervisor.



Disclaimer

This code of conduct does not constitute any rights against SERTO for employees or third parties. SERTO reserves the right to make changes to this code of conduct.