BOSSARD
Proven Productivity



How We Are Bossard

Code of Conduct

We do business in a professional and ethical manner.

We talk real.

Only sustainable success is success.

See something, say something!

We respect human rights and expect the same from our suppliers.

Bossard is committed to true and fair accounting and reporting.

We promote a safe and healthy work environment.

We protect ours and respect others' intellectual property rights.

How We Are Bossard

Avoid conflicts of interest. If there are any, solve it.

We play fair in the market.

Social media shall be used in a responsible manner

Only with continuous improvement we can strive to excellence.

We do not tolerate any form of bribery.

No insider information may be used for trading.

Each Bossard employee is the first line of defense against cybersecurity attacks.

Data privacy is key.

We promote diversity and inclusion.

BOSSARD CODE OF CONDUCT

Our corporate culture

Bossards corporate culture is represented by a tree with five values as its roots and five guiding principles as its branches.



BOSSARD CODE OF CONDUCT

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BOSSARD CODE OF CONDUCT

Introduction

Bossard was founded in 1831 as a local family-owned hardware store in Zug, Switzerland. In the almost two centuries since, we have grown to become a global group of companies focused on being the trusted expert brand providing assembly technology solutions for our customers. Today we remain a family-owned and family-oriented company with the same values, now projected on a global scale.

Our future growth and success depend on the trust of all our stakeholders. The Code was developed to protect the trust we have built since our inception. As a multi-cultural organization, it is important to us that our employees understand and live our Code. The Code aims to establish and standardize a minimum group-wide compliance. However, this does not prevent any company of the Bossard Group from establishing higher standards which may also be required by local laws. Thus this Code should be read in conjunction with local policies of a company of the Bossard Group.

Our ambitions are to remain a respected and contributing member of society and, through our sustainability initiatives, to continue to have a minimal negative impact on the environment. We strive to be an attractive and fair employer. Our Code is not just for employees – we expect ethical business practices from our customers, suppliers, and business partners.

To achieve this, we demand integrity and professionalism from our employees and those with whom we do business. As you go about your daily work at Bossard, keep in mind the key principles and rules described in our Code. And remember, We Talk Real – if you see a violation of our Code of Conduct, please speak up.

BOSSARD CODE OF CONDUCT

Letters

Dear Global Colleagues and Stakeholders

As a part of the Strategy 200 program led by Daniel Bossard, we came together as a cross-functional, global Sprint Team in February of 2021 with the task of creating guidelines to foster global ethical business practices. As we learned from each other, we realized that the best way to accomplish our goal was to develop a new Code of Conduct. We felt that it was important to document the culture of Bossard and how we should behave in our current world. We developed the new Code of Conduct to be easily understood in the different languages we speak and to provide real-life examples of the challenges we may face. As our business and cultures evolve, we intend for this document to grow and change in parallel. The new Code aims to establish a strong foundation for sustainable long-term success.

We thank the Management Team for empowering us to develop and present the Code to our colleagues. We enjoyed working together as a remote team and through the challenges that were present in 2021. We had many laughs and when we struggled as a team, We Talked Real with each other. We believe that the Code will be a useful guide in your endeavors towards Bossards continued success.

Your Sprint Team,

Carina (Bossard Switzerland), Daniela (Bossard Group), Line (Bossard Denmark), Rihab (Bossard Germany), Severine (Bossard France), Jeff (Bossard North America) and Brian (Bossard North America)



Dear Global Colleagues and Stakeholders

We are proud of our sprint team Carina, Daniela, Line, Rihab, Severine, Jeff and Brian for taking on the challenge. At Bossard, we are empowering employees from different functions, business units and cultures to positively impact the future business of Bossard. The Code of Conduct reflects our values and understanding of fair and ethical business practices. We are convinced that it will be of practical guidance in our daily business. Remember, if you see something, say something.

David Dean
Chairman of the board of directors

Dr. Daniel Bossard
Chief Executive Officer



BOSSARD CODE OF CONDUCT

How we do business

We seek competitive advantage through superior performance, knowledge, and products. We are committed to operating our business profitably, maintaining a strong financial base, and keeping our risks at an appropriate level while making every effort to minimize our environmental impact. Making a profit should never be justification for not complying with laws, taking unreasonable risks, or not assuming responsibility. Inappropriate business practices will not be tolerated.

Expectations

- We protect our trade secrets, and we respect the trade secrets of others.
- We treat with our customers, suppliers, and competitors fairly.
- We do not use unfair advantages through dishonest business practices, manipulation, abuse of privileged information, or concealing information.
- We seek to ensure compliance with all applicable local and international laws.
- We seek to ensure compliance with all legally mandated trade sanctions and embargoes.
- We never want to make unrealistic promises, and we honor our commitments.
- We do not take undue risk for the sake of profits.
- We conduct business sustainably and expect the same from our suppliers.

Q&A

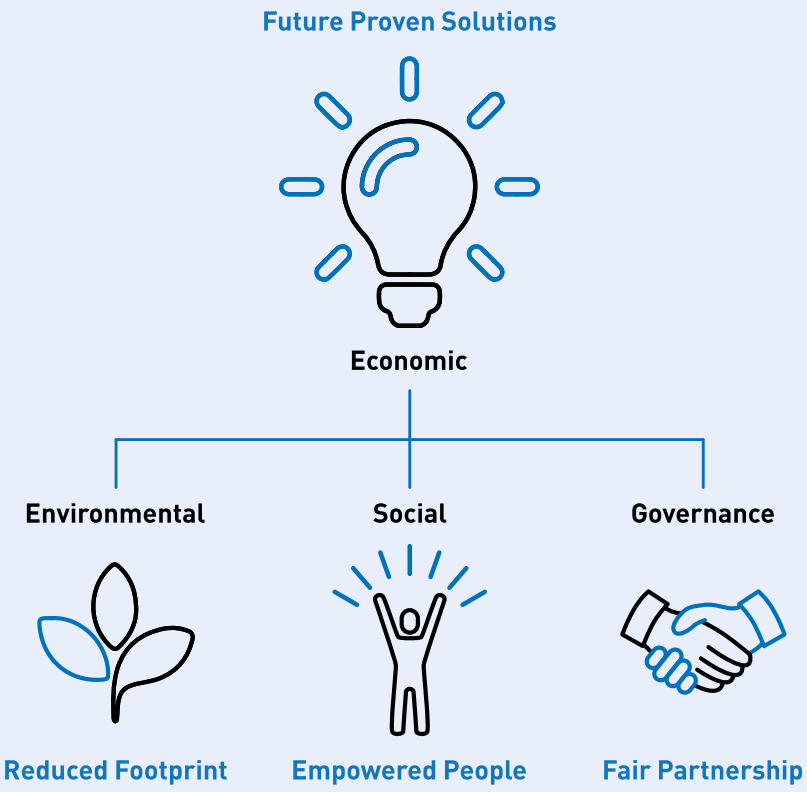
Q: Brian, a sales manager for a key account, has an opportunity to finalize a highly profitable project. The customer requires Restriction of Hazardous Substances ("RoHS") documentation, as required by the applicable European Union Directive to ensure the part for the project is compliant with international laws and standards. Documentation for these parts is not easily accessible. How should Brian handle this situation?

A: RoHS documentation is occasionally challenging to obtain. Never make a promise that you cannot keep. It is important to be transparent with our customers, and Brian should communicate the obstacles he has to overcome to complete this request. Brian needs to inform the supplier that the parts need to meet international laws and standards and that he has to provide documentation that the parts are indeed compliant. If a supplier cannot provide proper documentation, be transparent with the customer.

Remember...

- Doing business professionally and ethically is one of our core values.
- Behavior that can damage our brand will not be tolerated.
- If you are unsure how to react in a business situation, talk to your colleagues to discuss the best way to respond to a customer or supplier.

Only sustainable success is success.



BOSSARD CODE OF CONDUCT

How we promote corporate sustainability

At Bossard, we are committed to Corporate Sustainability, and we follow the Environmental, Social, and Governance ("ESG") principles in our daily business. We see ESG as a strategic, intrinsically motivated priority. While maintaining profitability, our business model accentuates environmental, social and governance-related needs. We ensure that these principles are lived within Bossard and are shared by our internal and external stakeholders.

With Future Proven Solutions, we want to create solutions that help our customers, our supply chain and ourselves to operate more sustainably, efficiently and fairly.

In our focus area Fair Partnership, we support community engagement and the integrity of all our stakeholders.

Expectations

- We understand that sustainable and profitable growth includes long-term business development that has no negative impact on nature, employees or partners.
- We use innovations to optimize internal processes and increasingly align products and services with the sustainability requirements of our customers.
- We lay the foundation for long-term business success by operating with integrity and adhering to our core values. As such, we take responsibility and support ongoing efforts such as the Carbon Border Adjustment Mechanism (CBAM).
- We take environmental and social criteria into account when selecting and working with suppliers. Cooperation with certified suppliers helps us incorporate environmental and social standards along the value chain.
- We are committed to creating demonstrable value for local communities through community engagement.

Q&A

Q: Josip wants to be a good member within the community in which he works, what can he do?

A: Josip is encouraged to organize volunteer activities to help meet the needs of the local community.

Q: Karren just started working at Bossard and asks Johanna in engineering services how they can help Bossards customers to limit their carbon footprint?

A: Johanna answers, that Bossards engineering services can help to reduce the weight of an end product. A lighter end product will use less energy and therefore have a reduced carbon footprint.

Remember...

- Hold colleagues accountable when you see improper practices that could lead to environmental or social detriment.
- Seek out projects and initiatives within your business unit that promote sustainable and environmentally safe practices.
- Only sustainable success is success.



Let´s be(e) sustainable



BOSSARD CODE OF CONDUCT

How we promote corporate sustainability

At Bossard, our commitment to sustainability extends to reducing our environmental footprint and empowering our people.

Under Reduced Footprint we prioritize minimizing our ecological impact through innovative practices and efficient resource management.

In Empowered People our success is driven by the dedication and creativity of our employees, who thrive in a culture of continuous learning, inclusivity, and collaboration.

Expectations

- We use energy efficiently, continuously increase our renewable energy share and overall, work on reducing our greenhouse gas emissions.
- We collect up to date and accurate data on our ESG impact.
- We minimize waste and reduce our environmental impact through responsible procurement, expanding services that promote the circular economy, reducing the amount of packaging, proper waste separation and waste disposal in compliance with the law.
- We constantly work on strengthening employee retention and attracting new talents, to stay a competitive employer.
- We promote the development of employees, to remain innovative and well prepared for changes and new work-related demands.
- We oppose discrimination, promote diversity and inclusion and are committed to equal opportunities for all employees.
- We consider the physical and mental well-being of our employees a top priority.

Q&A

Q: Fredrik wonders how he can contribute to reducing Bossards carbon footprint?

A: Fredrik could adopt sustainable practices such as minimizing energy usage (e.g. heating), use environmentally friendly mobility options, reduce waste, and contribute to other eco-friendly initiatives to help lower the company's overall carbon footprint.

Q: Lin wants to know what opportunities she has to create an inclusive working environment at Bossard?

A: Lin could take part in one of many individual local initiatives or familiarize herself with the Group-wide DEI strategy that focuses on the following 4 cornerstones: Work environment/structures, Diversity recruiting initiatives, Managerial involvement, Mentoring and sponsorship. Furthermore, she could join a sensitization Workshop.

Environmental Data

In the year 2023, Bossard set itself the following climate targets:

- Reduction of Scope 1 and 2 greenhouse gas emissions by 50 percent by 2031
- Reduction of Scope 1 and 2 greenhouse gas emissions to net zero by 2040

Here you can find our latest Environmental data

Remember...

- On an individual level, each Bossard employee is responsible for ensuring that appropriate actions are taken to promote and live ESG principles.
- We actively work towards reducing the negative environmental and social impacts in our operations and value chain.



BOSSARD CODE OF CONDUCT

How we respect human rights

At Bossard, we support and respect the principles contained in the UN Guiding Principles on Business and Human Rights (UNGPs) and other internationally recognized principles regarding human rights. We expect that our business partners will comply with similar standards, in particular to provide equal opportunities to all employees, to not tolerate harassment or maltreatment at the workplace, to respect employees' privacy, to not participate or benefit from any forced labor, to respect the maximum working hours in accordance with applicable laws, to recognize the freedom of association, to prohibit child labor, and to ensure a safe and healthy work environment.

Expectations

- We call for the promotion of human rights and respect human rights as set out in the Charter of the United Nations, in particular those named below:
  - Privacy protection.
  - Ensuring health and work safety, especially the guarantee of a safe and health-promoting work environment, avoiding accidents and injuries.
  - Protection of employees against physical punishment and against physical, sexual, psychological or verbal harassment or abuse.
  - Protection and granting of the right of freedom of speech and freedom of expression.
- We do not tolerate violations of the following ILO (International Labour Organization) core labor standards: the prohibition of child or forced labor of any kind or disrespect of the rights of employees and discriminatory treatment of employees, especially in our sphere of influence in the supply chain.
- We expect the same from our suppliers and other business partners and conduct due diligence to ensure that they respect internationally recognized principles regarding human rights. We do not tolerate violation of human rights and will take appropriate steps.

Q&A

Q: Ken wants to engage a supplier who provides competitive products. However, this supplier was recently found to use child labor. Should Ken enter into a contract with this supplier?

A: Ken should not engage this supplier. Competitive products are never a justification for violation of human rights. We do respect human rights and require the same from our suppliers.

Remember...

- Support, respect and foster human rights in our daily business.
- Monitor the human right practices of our suppliers and other business partners on a regular basis.
- Take appropriate steps if we face a violation of human rights.



BOSSARD CODE OF CONDUCT

How we communicate

Bossard is a worldwide, family-orientated company, and our reputation as a reliable business partner has been built over many years. Our employees and stakeholders with whom we interact with come from many different countries, backgrounds, and cultures. In both internal and external communications, we maintain the highest standards to reflect our professionalism and our responsibility. From seniors to subordinates, customers, and suppliers, We Talk Real!

Expectations

- We must familiarize ourselves with and understand the internal directives and guidances set in place to maintain the Bossard standards of communication.
- We protect confidential information and only share it with authorized parties.
- We require that all social media postings must not negatively impact Bossard's reputation in any way.
- We strive to address all miscommunications with those involved to ensure 100 % transparency.
- We expect that all discussions take place in a respectful manner.
- We as a multicultural company, communicate in different languages and different time zones. We therefore need to be attentive to the language, the time, the channel, and our recipient when we communicate.

Q&A

Q: Severine and Daniela from different departments have a disagreement about Daniela's interpretation of an internal process. What could Severine say without offending her?

A: Severine could explain to Daniela how she understands the process. They should be respectful of each other's view, and try to discuss it and find the best way to solve their misunderstanding and in that way improve the internal processes.

Q: Franklin, an employee of Bossard, is constantly talking to his team members negatively about company-related matters and makes thereby false statements about Bossard. What should Franklin's team members do?

A: His team members should respectfully point out to Franklin that his behavior is not appropriate. As an employee of Bossard, Franklin should speak and act cautiously and appropriately about the company. Franklin's statement and action will influence the company's image and reputation, both internally and externally.

Remember...

- Your words and actions are not only a direct reflection of yourself but a reflection of those who represent you and those whom you represent.
- We all make mistakes. When mistakes happen, own up to, communicate, and remedy them.
- Before sending out an email or external communication, review it to ensure you are properly portraying your message.
- Responsiveness is key to customer appreciation.
- Be aware of the language used, the time zone, and the culture of our recipients. Without these considerations, our message could be misunderstood.
- Appropriate communication is one way to protect our name.



BOSSARD CODE OF CONDUCT

How we ensure health and safety

In the spirit of Bossard's Proven Productivity and sustainable practices, we protect our employees against health impairments with extensive preventative measures and provide a safe and healthy environment for our employees and stakeholders. We promote occupational and personal health to ensure a healthy life at and away from the workplace. We have adopted robust safety practices to reduce risks. The objective of our efforts is to structure our organization and facilities in such a manner that the health and safety of employees cannot be impaired. For this purpose, we conduct hazard and risk assessments as well as regular instruction of employees. Our top priority is to prevent accidents and injuries, in the workplace as well as on work-related travel.

Expectations

- We are familiar with our safety rules and take responsibility for following them during our daily operations, travels to work, and visits.
- We follow without exception applicable local laws, government regulations, and policies relating to a safe and healthy workplace.
- We take all measures to eliminate hazardous practices.
- We are continuously improving our safety practices through scheduled reviews and adjusting our standards when necessary.
- We take responsibility for the safety of our visitors within our facilities.
- We respect the immediate and long-term health of others.
- We make sure not to introduce unnecessary health and safety risks.
- We promote a healthy balance between work and private life.

Q&A

Q: Rihab sees that Brian is not wearing proper protective equipment during receiving operations even though the work instruction mentions "wearing protective gloves." What should Rihab do?

A: Remember, We Talk Real. Rihab should remind Brian to follow the safety rules. As a second step, she can suggest a refresher course on safety instructions.

Remember...

- Health and safety are everyone's concern.
- Apply the rules defined by the Bossard Group and in each Bossard Unit, including the rules for visitors, to protect all of us from accidents or injury.
- Recognize improvements in health and safety conditions as benefits, and to raise awareness when such conditions are lacking.



BOSSARD CODE OF CONDUCT

How we protect intellectual and physical property and confidential information

While doing business, we may deal with our own confidential information and intellectual property but also with that of third parties. These includes patents, trademarks, copyrights, and any non-public information such as business secrets, engineering ideas, designs, and financial data. We take appropriate measures to protect our own intellectual property rights and confidential information and those of third parties. This includes the protection of our own and third-party physical property. Our continued success depends on the careful use of intellectual and physical property and confidential information.

Expectations

- We protect our own intellectual property and confidential information through appropriate measures.
- We share confidential information with employees and with external parties only if needed for the course of the business.
- We are careful in the selection of our business partners.
- We implement appropriate measures when we need to share confidential information with a third party, which includes entering into a proper non-disclosure agreement.
- We also take appropriate measures when protecting our own and third-party intellectual property, confidential information, and physical property (e.g. password protection of computers, appropriate marks on third-party physical property).
- We respect the intellectual property and confidential information of third parties.
- We do not tolerate the violation of our intellectual property rights, e.g. our trademark rights, and will take appropriate legal steps.
- We continue to respect any obligations regarding confidentiality and intellectual property even after the termination of our engagement.

Q&A

Q: Franz faces an interesting business opportunity with a third party where he needs to disclose Bossard business secrets. What should he do next?

A: Before disclosing any Bossard business secrets to a third party we must enter into a proper non-disclosure agreement with the third party, in order to make sure that confidential information is only used for the intended purpose and not misused in any way. In any case, Franz should be careful in the selection of his business partners. Even if a non-disclosure agreement is entered into, if the other party is not a serious partner, an inappropriate disclosure of confidential information can only be remedied by taking legal steps which may be costly and difficult to enforce.

Remember...

- Protect our own intellectual and physical property and confidential information and respect that of third parties.
- Share confidential information only if needed in the course of business.
- Do not discuss any business projects in public (e.g. on trains or airplanes).
- Seek advice from Group Legal in case you have any questions, doubts, or concerns regarding the handling of intellectual property and confidential information.



BOSSARD CODE OF CONDUCT

How we prohibit using insider information for trading

During the performance of their work, Bossards employees may have access to insider information. Insider information is material non-public information about Bossard or its publicly listed business partners (such as financial data, acquisitions of a company, etc.) which, if made public, could have a significant impact on the price of the securities, or which a reasonable investor would consider important in deciding whether to purchase, hold or sell securities. Insider information is considered non-public until it has been effectively disclosed to the public, such as in a press release, newspaper, or on Bossards (or our business partners') external website. As provided by law, insider information must not be misused. Failure to comply with these rules may lead to disciplinary measures and penalties.

Expectations

- We keep insider information confidential.
- We do not provide "tips" or otherwise make unauthorized disclosure of insider information to any non-insiders, whether or not within Bossard Group.
- We may not buy, sell, or otherwise engage in transactions in Bossards or our business partners' securities during the period when we have access to insider information.
- We must not solicit, influence or counsel any person or company to recommend, deal or execute transactions in securities about which we have material, non-public information. In addition, care should be taken so that such information is kept secure.
- Penalties for trading while in possession of or communicating material non-public information can be severe, both for individuals involved in such unlawful conduct and their employers.

Q&A

Q: A colleague unintentionally forwards to Anna documents relating to a potential acquisition of a fastener company by Bossard. Is Anna allowed to trade securities of Bossard or the other company?

A: No, she is not. Such a transaction will most likely have a material effect on the price of the securities and therefore qualifies as insider information. Everyone in possession of insider information, even if received by coincidence, must follow the rules regarding insider information.

Remember...

- Do not disclose insider information in any way.
- Do not trade securities based on insider information.
- Contact Group Legal if you are in doubt whether the insider rules are applicable or not in a certain situation.


We talk real.



BOSSARD CODE OF CONDUCT

How we ensure true and fair accounting and reporting

At Bossard, we accurately record all our material financial transactions, assets, and liabilities. This enables us to report our finances in a true and fair view and to comply with the laws and regulations that govern our accounting principles and financial reporting. This includes compliance with anti-money laundering laws, applicable tax laws, and custom trade and export controls. A false, fictitious or misleading accounting entry or statement can jeopardize the trust of our shareholders, debt investors, and the capital markets, resulting in loss of or damage to our reputation and assets, and may result in criminal penalties.

Expectations

- We ensure that all business transactions are recorded according to our accounting principles.
- We follow the delegation of authority rules.
- We do not forge or destroy accounting records or their supporting documentation.
- We report suspicious transactions and are attentive regarding suspicious emails, especially those that contain payment requests and requests for financial information.
- We never make false or misleading statements in any financial report, expense claim, or investment proposal.
- We follow the tax and compliance rules of each country in which we operate.
- We never share financial information with internal or external parties without proper authorization.

Q&A

Q: A supplier asks Namfon to make the next payment to a new offshore bank account in a destination known to be a tax haven. As an incentive, they offer a 5% discount on the purchase. Should Namfon make the payment?

A: No. If Namfon makes the payment without further investigations, she might help the supplier with money laundering and tax evasion. Since we would even get a discount, this could result in serious financial and legal consequences for Bossard. Namfon needs to report this internally as a suspicious transaction.

Remember...

- Never share any financial records, information, or data without proper authorization.
- Do not hesitate to report a suspicious transaction.
- Do not falsify, forge or destroy accounting records or related documentation.
- The trust of our shareholders, our debt investors, and the capital markets are essential for our strategic goals and access to financial resources.



BOSSARD CODE OF CONDUCT

How we deal with conflicts of interest

A conflict of interest occurs when the personal interests of an employee conflict with or reasonably appear to conflict with the interests of Bossard. In that case, it can be difficult for the employee to still act in the best interest of Bossard. An employee must therefore avoid a situation where their actions might create a conflict of interest, whether it is actual, potential, or perceived. Conflicts of interest can have many forms. For example, external engagements (e.g., external employment, acting as a consultant, external mandates) that may interfere with our responsibilities at Bossard, or receiving gifts or other favors from suppliers, customers, and competitors which may, or may reasonably be perceived as influencing our business decisions.

Expectations

- We recognize when there is an actual or potential conflict of interest.
- We avoid situations that are or may reasonably be perceived to be a conflict of interest.
- We are aware that conflicts of interest can arise in many ways. If in doubt, we seek advice internally.
- We must not use our position at Bossard for our personal benefit or for the benefit of close family members or other closely related persons.
- We must immediately disclose any conflicts of interest.

Q&A

Q: Mila and her team are interviewing Mila's brother-in-law for a position in her team. What should she do?

A: Mila must promptly disclose that she is related to the job candidate and discuss further steps internally.

Remember...

- Avoid any situation in which your personal interests conflict or appear to conflict with Bossards interest.
- Inform your leader immediately if there is a conflict of interest to resolve the situation.
- Consult your leader or Group Legal if you are in doubt whether there is a conflict of interest.



BOSSARD CODE OF CONDUCT

How we ensure information and technology security

It's an unpleasant fact of modern life that cyber-security must be a top priority for individuals and businesses. A successful cyberattack can shut down a business , resulting in lost jobs, missed deliveries, and a permanently stained reputation. The good news is that this can be greatly mitigated by understanding that every single one of us is responsible for keeping Bossard secure. Our employees must stay vigilant and use appropriate caution and common sense.

Expectations

- We are vigilant and cautious.
- We think before we click (especially Approve Login, Send, or Download).
- We don't use our Bossard password anywhere else and never share it with anyone.
- We keep our PCs and devices locked when we step away from them.
- We work with IT to bring new technology into the company.
- We report suspicious incidents immediately.
- We actively participate in cybersecurity and user awareness training.

Q&A

Q: Raphael received a very well-forged phishing email and clicked on a link. It asked him to log in, and he provided his Bossard password and approved it on his Authenticator app. Then he realized that the site looks suspicious and that he may have made a mistake. What does he do?

A: Raphael knows that We Collaborate and Talk Real. He changes his password and immediately notifies IT Security about the incident. This gives Bossard the best chance to assess whether the attacker did any damage and to prevent harm. Mistakes happen to anyone. Talking Real and Collaborating saves us in this case.

Q: Jana was given a shiny new USB stick by somebody at a conference. Is it safe to use?

A: Vigilance tells her to assume that it is not safe. Free or found USB sticks are some of the most common ways attackers use to introduce malicious software into corporate networks.

Remember...

- You are the first line of defense against cybersecurity attacks.
- Most successful attacks come from social engineering, i.e., tricking employees into taking actions that compromise the network (e.g., opening a malicious attachment or link, urgently demanding a change to bank account information).
- Email is like sending a post card in the mail: You don't know which way it takes on the internet, and anyone it passes can read it if they want.



BOSSARD CODE OF CONDUCT

How we conduct ourselves on social media

Bossard recognizes the many beneficial uses of social media, although, as with many things, there is a right and wrong way of using these platforms. If you choose to use social media platforms, do so responsibly and respectfully. In today's ever-changing world, posts that are well thought through are essential to maintaining an individual's online integrity. Remember that whether it be a personal or professional post, the content that you post will always follow you.

Expectations

- We always communicate responsibly and respectfully on social media.
- We always speak for ourselves in our personal social media profiles.
- We require that all social media postings, including posting of pictures, must not negatively impact Bossards reputation in any way.
- We promote Bossards capabilities according to our values and culture.
- We respond to comments on our posts on professional networks promptly and when it is appropriate and provides value.
- We respect copyrights.
- We protect confidential information.
- We use social media to network and grow our professional profile.

Q&A

Q: Jack would like to use his Facebook profile to promote Bossards Smart Factory Tools through his network. Is this acceptable?

A: If you post about Bossard on your own page, you expose other personal posts to colleagues, customers, and suppliers. We encourage you to use social media but ask that you keep your professional and personal profiles separate. Remember, your personal opinions and views could be misinterpreted as those of Bossards.

Remember...

- External channels of Bossard are only represented by the Bossard Group management and marketing department.
- Always proofread your posts so that your intentions are correct and cannot be misunderstood or misinterpreted.
- Appropriate posts are one way to protect our name.
- With being restricted by characters counts on social media, be aware that your opinions may not allow others to draw the connections or conclusions necessary to properly understand. Ensure to validate your opinions by elaborating how you personally have drawn the conclusions.
- Third parties may incorrectly perceive your opinions expressed on personal social media as being shared by Bossard.



BOSSARD CODE OF CONDUCT

How we comply with competition laws

We at Bossard are committed to complying with applicable competition laws. Also known as anti-trust laws, competition laws aim to prevent anti-competitive behavior in the market. These laws shall ensure that the market is fair for consumers and producers. Anti-competitive practices have the objective or the effect of preventing, restricting, or distorting competition. Along with reputational damage, companies that exhibit this behavior may find their agreements unenforceable, risk being fined heavy penalties, and faced with lawsuits.

Expectations

- We are committed to complying with competition laws to ensure a fair market.
- We expect that each employee involved in the relevant business understands the principles of competition laws.
- We expect that our suppliers will adhere to competition laws.
- We seek legal guidance if we are not sure whether a behavior is compliant with competition laws.

Q&A

Q: Jeff's friend Jumpy works in the sales department of a Bossard competitor. Both Bossard and Jumpy's company sell the same type of products. Jeff meets Jumpy at an informal lunch. Jumpy wants to discuss the companies' prices and wants to convince Jeff to raise prices for these products so they can realize a bigger sales margin. What should Jeff do?

A: Jeff must immediately stop the discussion before any prices or price increases are revealed. Competitors are not allowed to exchange and agree to fix prices or raise prices. This is also the case when the "agreement" is not in writing. Under competition law, "agreements" encompass not only formal written agreements but also any oral contract, informal and gentlemen's agreements.

Remember...

- Comply with applicable competition laws whenever you are dealing with competitors, suppliers, customers, distributors, or other trading partners.
- Violation of competition laws could have significant negative consequences for Bossard and you.
- Proactively seek legal advice within Bossard if you are unsure of whether a behavior is compliant with competition laws or not.



We do business in a professional and ethical manner.



BOSSARD CODE OF CONDUCT

How we prevent bribery and improper advantages

Bossard does not tolerate any form of bribery or granting improper advantages by its employees or business partners. We do not offer, promise, give, accept or solicit an improper advantage as an inducement (e.g. money, gifts, loans, fees, rewards, or other advantages) for an action that is illegal, unethical, or a breach of trust or that could raise concerns about the personal integrity of Bossard employees. Bribes and improper advantages can result in criminal and civil actions against Bossard and the employees involved as well as in reputational damage to Bossard.

Expectations

- We understand that many countries have strict laws regarding bribery and granting improper advantages.
- We never accept any form of bribe or improper advantage.
- We do not do business with partners who tolerate bribery or granting improper advantages.
- We may give or receive gifts or entertainment only where they are appropriate, reasonable and where they do not or do not appear to influence the recipient's decision.

Q&A

Q: A supplier of Bossard gives Max, an employee at Bossard, tickets for the Football Champions League Final which are expensive and hard to get. Is it OK to accept the tickets?

A: No, Max should not accept these tickets. The tickets are beyond what is considered a reasonable gift. Accepting such tickets from a supplier or other business partner is likely to be considered a bribe or improper advantage.

Remember...

- Never tolerate any form of bribe or improper advantage.
- Turn down any offers, gifts, etc. that could affect your personal integrity or influence your decisions.
- Contact Group Legal if you're in doubt whether a situation could qualify as a bribe or improper advantage.



BOSSARD CODE OF CONDUCT

How we ensure data privacy

Personal data is any information that relates to an individual person who can be directly or indirectly identified. This may include their name, email address, location data, gender, or ethnicity. Data protection laws aim to control how personal data is used by organizations, businesses, or the government. In our daily business, we process personal data following applicable data protection laws, e.g., the Swiss Data Privacy Act, the European General Data Protection Regulation (GDPR) and California Consumer Privacy Act (CCPA)). Violation of applicable data protection laws can result in high fines or criminal prosecution.

Expectations

- We collect, process, transfer, make available, store and otherwise use personal data per applicable data protection laws.
- We also require compliance with applicable data protection laws from our suppliers, customers, and other business partners.
- We handle personal data in accordance with applicable data protection principles, such as lawfulness, fairness, transparency, limitation of purpose, data minimization, accuracy, storage limitation, integrity, and confidentiality and accountability.
- We repspect the individuals' applicable privacy rights.
- We handle data securely by implementing appropriate technical and organizational measures.
- We report security incidents involving personal data immediately through the appropriate channels provided in Bossards data protection policies.
- We do not keep personal data longer than is necessary for the collected purpose and as required by applicable laws.
- We comply with the applicable restrictions on transferring personal data outside of the country where the personal data originated.

Q&A

Q: Eric's password for his Bossard email account has been stolen. What should he do?

A: Using the stolen password, an unauthorized person could potentially access personal data stored in Eric's email accounts. Eric must immediately report this incident through the appropriate channels as provided in Bossards internal data privacy policies.

Remember...

- Be familiar with the principles of data protection laws and the Bossard policies on data protection laws.
- Be diligent with the personal data of others and to treat it according to applicable data protection principles.
- Comply with applicable data protection laws.
- Reach out to Bossards Group Data Protection Officer (group_dataprotection@bossard.com) if you have questions or concerns.



BOSSARD CODE OF CONDUCT

How we hire and employ

Trust, leadership, social responsibility, entrepreneurship, and credibility are the values of the Bossard culture. They form the roots for our guiding principles on which we base our actions: "We Experiment," "We Collaborate," "We Empower," "We deliver value," and "We Talk Real." All our employees are a vital part of the culture we live through our values and guiding principles. It is everyone's job to fill them with life.

Expectations

- We comply with applicable local employment laws.
- We pursue a long-term human resources policy that begins with recruitment and onboarding and is sustained by an integrative work environment and supported by the continuous development of our employees.
- We create equal opportunities regardless of factors such as race, religion, color, sex, gender identity, sexual orientation, national origin, citizenship status, uniform service member status, pregnancy, age, genetic information, disability,, or any other protected status in accordance with applicable laws.
- We promote diversity and inclusion through our values and guiding principles.
- We treat each other with respect, honesty, and fairness.
- We do not tolerate discrimination, harassment, and reprisals in our work environment.
- We communicate clearly with doors open so that each employee can understand decisions and support the corporate development.
- We encourage a healthy work-life balance.
- We foster flexible work models and top sharing models to accommodate the needs of our employees (home office, part-time, compressed schedules) and give them the same career development opportunities.
- We trust in the talents of our employees, and we allow them to develop their personal and professional skills.

Q&A

Q: My co-worker Taylor constantly makes jokes about people with my skin color, and I feel that I am being discriminated against. What should I do?

A: We do not tolerate any form of discrimination. If you believe that you are being discriminated against by Taylor, or if you observe him engaging in this behavior against others, you should report this misbehavior in accordance with our guidelines provided in the Chapter of this Code of Conduct "How we raise concerns". Reporting can be made to your leader or by using our reporting line.

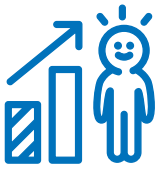
Q: My friend Matteo saw an interesting job offer at Bossard with the option to work four or five days a week. He would like to work four days a week. Does he have a fair chance to get the job with a part-time schedule and can he still pursue a career?

A: We hire based on qualifications for the job opportunity, and, subject to our legitimate business needs, we will consider any job applicants, regardless of whether she/he wishes to work full or part-time. We foster the development of employees regardless of their work schedule.

Remember...

- Follow and model our guiding principles in your daily work.
- Treat each other in a respectful, honest, and fair way.
- Communicate clearly and transparently and enable others to express their opinion.
- Never accept discrimination, harassment, and reprisals in your work environment.
- Empower and develop the potential in people.


We promote
diversity and
inclusion.



BOSSARD CODE OF CONDUCT

How we improve

We are committed to excellence through the continuous improvement of our practices, processes, and know-how. We consider mistakes as a chance to improve. We periodically review our current and past performance, including lessons learned, to achieve our common goals. With the adherence to the principles outlined in this Code of Conduct we strive towards excellence. Continuous improvement is the backbone of the Bossard Group.

Expectations

- We ensure that each employee of the Bossard Group understands the Bossard Code of Conduct.
- We are committed to ensuring that the Bossard Code of Conduct is consistently followed throughout the Bossard Group.
- We regularly review our performance, practices, and processes to improve them.
- We continue to improve our services and products for our customers.
- Our improvements contribute to the satisfaction of our customers, the strengthening of our partnerships with suppliers, our company and our colleagues.
- We promote cross-cultural teamwork across our Business Units around the globe and thereby acknowledge the cultural differences.
- Together, we participate in continuous improvement on a daily basis: through teamwork, through collaboration, through the pursuit for excellence.
- We foster a culture where we live our guiding principles.
- We encourage our employees to develop or improve processes and then create a prototype to share with the organization. We Experiment!

Q&A

Q: Li has an idea for improving a quality process, but she does not know with whom or how she can share it.

A: Improvements are always welcome at Bossard. Li can propose this improvement idea to the organization by email or during a conversation. After that, it will be decided whether or not to work on this idea with a specific team.

Remember...

- View mistakes as opportunities for improvement.
- Collaborate with colleagues to improve our practices every day. Pursuit of excellence is our way of working.
- Our improvements benefit our daily work.



BOSSARD CODE OF CONDUCT

How we raise concerns

If you know of or suspect non-compliance with Bossards Code of Conduct, or a violation of any law, you should report the issue. You can report your concerns to your trusted leader or via email or one of our other reporting options available on our Intranet. Concerns can also be submitted anonymously and we will take all reasonable measures to protect anonym complaints.

Expectations

- We encourage you to raise concerns if you believe in good faith that misconduct has happened.
- We value your privacy, and you can submit your concern anonymously.
- We take all reasonable measures to protect anonymous complaints.
- We do not allow or condone retaliation for reports of misconduct that are made in good faith.
- We do not tolerate reports that are made in bad faith.
- We may have to investigate ethical matters that are reported.
- We will cooperate, if required, in internal investigations of misconduct.

Remember...

- We live our values. See something, say something.
- We do not tolerate non-compliance.
- We do not tolerate retaliation for reporting non-compliance.
- We take the reports seriously.
- We will take the appropriate actions depending on the outcome of our investigation.

Q&A

Q: Emia overhears a discussion where Brian offers better pricing on bolts to a customer in exchange for center ice seats for Saturday's EV Zug match. Should Emia report this conversation?

A: Soliciting gifts from a customer in exchange for better pricing is not acceptable. At a minimum, this matter should be raised to your leader. If you are not comfortable raising the issue to your leader, you may use one of the anonymous reporting options available.

Q: Henry is a junior accountant and notices a series of questionable wire transfers made by his leader. Henry wants to report these transfers but is worried he will be retaliated against if he does. Should he report his concerns?

A: Yes. It is against our values to retaliate for the reporting of a potential violation. If you feel nervous about reporting, you can file an anonymous report. You may have to participate in an investigation if one is deemed necessary, and we will take measures to keep your identity private.

How to report

- In person to your trusted leader.
- To the Bossard Group at group_integrity@bossard.com.
- Further reporting options available on our Intranet.

See something,
say something!

This Code of Conduct was approved by the board of directors and entered into force on March 7, 2022.
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