

# Our Code of Conduct

The success of our manufacture is based on our own behavior. An all-round, respectful and socially responsible approach to our employees, suppliers and customers, sustainable action, transparent communication, and compliance with laws, rules and regulations are important factors in the working environment, and at our manufacture, we do our utmost to apply our best possible skills and knowledge on a daily basis.

This Code of Conduct lays out the rules of conduct that apply to us as employees. They define our actions, both within our manufacture and toward our customers, suppliers and business partners, as well as towards our environment and society.

Klingnau, June 2018

Monika Walser  
CEO de Sede AG



## **1. We comport ourselves out of a sense of social responsibility.**

We commit ourselves to behaving responsibly, honestly and reliably in all that we do. We ensure that our decisions and actions are consistent with this Code of Conduct, applicable law and the rules in effect. We respect the interests of our employees, customers, suppliers and society. We identify potential conflicts of interest and clarify them, or try to prevent them from occurring in advance.

## **2. We respect the law.**

We comply with generally applicable law. All of our employees and executives adhere to applicable law, rules and directives.

### **Working hours**

We comply with labor standards in regard to the maximum permissible working hours.

### **Remuneration**

We pay wages in line with the market. The amount of one's salary is a function of the individual's position and performance in a particular job.

### **Child and forced labor**

We prohibit forced and child labor. Children and adolescents under the age of 15 may not be employed. An exception to this are apprenticeship contracts with young people following completion of compulsory schooling.

## **3. We are conscientious in our approach to confidentiality and trust.**

We treat all confidential information as such and do not disseminate unofficial information unless required to do so by law.

Through our actions as employees, we strengthen confidence in the de Sede brand. At the same time, we refrain from actions that could jeopardize this trust.

## **4. We act with respect.**

### **Equality of opportunity**

We are committed to equality of opportunity, regardless of ethnicity, nationality, gender, sexual orientation, age, civilian and marital status, pregnancy or disability.

### **Prohibition on discrimination**

We are committed to discrimination-free treatment of all employees, customers, suppliers and business partners.

### **Direct communication**

Our company is governed by an open-door policy: all employees have the opportunity to approach supervisors or the management directly.

## **5. We do not engage in bribery, nor do we permit others to bribe us.**

Honesty and fairness are central values for our manufacture. We resolutely reject bribery or other forms of corruption. We do not grant undue advantages to employees, customers, suppliers or business partners in order to secure an order or to maintain business relationships.

### **Handling of gifts and invitations**

Employees may offer small gifts to customers, suppliers, business partners or other persons. If a gift exceeds CHF 100 in value, it must be approved by two members of management.

Every employee may accept gifts and invitations if to do so is in keeping with customary practice. If a gift or invitation exceeds CHF 100 in value, it must be approved by two members of management.

## **6. We act sustainably.**

Sustainable action and behavior is of great importance to us. We take responsibility along the entire value chain and grant equal consideration to the interests of all reference groups by gearing our activity to the relevant principles of sustainability.

Core topics are the sustainable procurement and disposal of raw materials, a responsible approach toward the environment, respect for animals, making the best possible use of environmentally friendly technologies, continuous improvement of production steps, and systematic training for our employees.

Our approach to the environment is described in detail in our own Environmental Policy published on our website. In that Policy, we commit ourselves to environmentally friendly and energy-efficient production and business activity.

## **7. We are transparent.**

Our communication is honest, direct and professional – whether toward employees, customers, suppliers or business partners.

We are committed to free and fair competition. We do not enter into any arrangements with competitors or business partners with a view to pursuing or securing an impermissible restriction of competition. We do not hinder competitors, and we do not exploit our business partners. Our understanding of business is rooted in the principle of good faith.

## 8. We protect data and business secrets.

We protect data, confidential information and business secrets from disclosure to unauthorized persons. Employees who have access to confidential documents are not permitted to disclose them to third parties. We process personal data solely on the basis of provisions of law (EU GDPR, Federal Act on Data Protection [FADP]).

## 9. We take care for health and maintain safety.

We comply with the stipulations and standards of the laws on security and safety.

In all that we do, our first commitment is to human health. In addition to the protection of employees, customers and suppliers or business partners, we also protect our manufactured products, as well as our buildings and facilities.

Our employees must ensure that the workplace is safe and free from health risks. All environmental and health and safety regulations must be followed.

Our rules on safety and health are set forth in great detail in a separate Safety Policy published on our website.

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### Applicability of this Code of Conduct

This Code of Conduct applies to all full- and part-time employees, as well as to all agents and freelance employees.

### Reaction in case of violation

A violation of these points set forth in the Code of Conduct must be reported directly to the supervisor so that suitable steps can be taken.

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