



## COVER AND SIGNATURE PAGE OF THE SUPPLIER CODE OF CONDUCT

The purpose of this Supplier Code of Conduct is to establish controls to ensure compliance with all applicable laws, rules and legal regulations and to ensure that the business in our supply chain is conducted in a socially, ecologically and economically responsible manner.

### I. ETHICAL RESPONSIBILITY

- BUSINESS INTEGRITY/CORRUPTION PREVENTION
- FAIR COMPETITION
- DISCLOSURE OF INFORMATION/PROTECTION OF INTELLECTUAL PROPERTY / PRIVACY
- CONFLICT MINERALS
- AVOIDANCE OF CONFLICTS OF INTEREST

### II. LABOR AND HUMAN RIGHTS

- CHILD LABOR AVOIDANCE
- FREELY CHOSEN EMPLOYMENT
- WORKING HOURS, WAGES AND BENEFITS
- FREEDOM OF ASSOCIATION
- ANTIDISCRIMINATION

### III. HEALTH AND SAFETY

### IV. QUALITY AND ENVIRONMENT

- QUALITY
- ENVIRONMENT

### V. MANAGEMENT COMMITMENT

- COMPLIANCE WITH LAWS, RULES AND LEGAL REGULATIONS
- REPORTING IRREGULARITIES/CONCERNS

### VI. MONITORING, VIOLATIONS AND REVIEW

We hereby confirm that we share, respect, adhere to, and apply the values as stated in the whole Supplier Code.

Company name/stamp: \_\_\_\_\_

Place, date: \_\_\_\_\_

Name (block letters) \_\_\_\_\_

Signature \_\_\_\_\_

Function of signee: \_\_\_\_\_



## SUPPLIER CODE OF CONDUCT

### 1. PURPOSE

The purpose of this Supplier Code of Conduct is to establish controls to ensure compliance with all applicable laws, rules and legal regulations, and to ensure that the business in our supply chain is conducted in a socially, ecologically and economically responsible manner. Therefore, every Interroll employee undertakes to abide by statutory regulations, the Interroll Code of Conduct and the Anti-Bribery and Anti-Corruption Guidelines, which provide more details regarding ethical business conduct and compliance with the law as requested in the **Organizational Regulations of Interroll Holding AG** as well as the **Organizational Regulations for the Executive Management of the Interroll Group**.

### 2. POLICY STATEMENT

Interroll is guided by the principles of sustainability. To fulfill our responsibility toward future generations, we ensure that our products and business processes are sustainable in environmental, economic, and social terms, and are always consistent with state-of-the-art technology.

We have aligned our strategies and operations with universal principles on human rights, labor, environment and anti-corruption, and take actions that advance societal goals. Therefore, this Supplier Code of Conduct is in full compliance with the basic principles by the United Nations Global Compact platform.

Interroll expects all of its suppliers and subcontractors to share the principles which are consistent with Interroll's company values and expressed in this Supplier Code of Conduct and that comprise an important component of supplier selection and evaluation. Moreover, we expect our suppliers to replicate these standards further down the supply chain.

In general, our policy is that suppliers must be selected solely based on objective criteria after comparing price, quality, performance, and suitability. Agreements with suppliers must be made in a clear and distinct form and must be documented together with subsequent amendments and supplements.

This code goes beyond mere compliance with the law by drawing upon internationally recognized standards to advance social and environmental responsibility. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law.

### 3. SCOPE

#### 3.1 WHO IS COVERED BY THE GUIDELINES?

This Supplier Code of Conduct applies to suppliers and their subsidiaries, affiliates, and subcontractors, consultants, vendors, brokers, merchants, dealers, contractors, agents and other providing goods and services to Interroll worldwide (hereinafter referred to as "suppliers").

#### 3.2 WHAT IS INCLUDED?

Our principles:

- Ethical responsibility
- Labor and human rights
- Health and safety
- Quality and environment
- Management commitment



#### **4. ETHICAL RESPONSIBILITY**

It is our code to conduct all of our business in an honest and ethical manner. We are committed to acting professionally, fairly, and with integrity in all of our business dealings and relationships.

Suppliers shall always be ethical in every aspect of its business, including relationships, practices, sourcing, and operations. Ethical requirements include the following aspects:

##### **4.1 BUSINESS INTEGRITY/CORRUPTION PREVENTION**

Suppliers are expected not to practice or tolerate any form of corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Suppliers will not offer or accept bribes or other unlawful incentives to/from their business partners. Our detailed requirements are regulated in the Interroll Anti-Bribery and Anti-Corruption Guidelines.

##### **4.2 FAIR COMPETITION**

Interroll respects fair competition. The company complies with current laws protecting and promoting competition, particularly current antitrust laws and other laws regulating competition. In competing for market share, Interroll is guided by the need to act with integrity. Suppliers will, accordingly, conduct their business in line with fair competition and in accordance with all applicable antitrust laws.

##### **4.3 DISCLOSURE OF INFORMATION/PROTECTION OF INTELLECTUAL PROPERTY PRIVACY**

Suppliers will safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected. This obligation to maintain confidentiality also applies after termination of the business relationship.

##### **4.4 CONFLICT MINERALS**

Suppliers are expected to take reasonable efforts to avoid that their products supplied to Interroll contain no metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups.

##### **4.5 AVOIDANCE OF CONFLICTS OF INTEREST**

We expect our suppliers to avoid all conflicts of interest that may adversely influence the business relationship.

#### **5. LABOR AND HUMAN RIGHTS**

Interroll treats its employees fairly and openly. In line with the Interroll Identity and the Corporate Culture, the Group expects all employees to be objective, courteous, and fair in their dealings with colleagues, employees, and third parties. Interroll believes all workers in our supply chain deserve a fair and ethical workplace. Suppliers are expected to protect the human rights of their employees and to treat them with dignity and respect.

##### **5.1 CHILD LABOR AVOIDANCE**

Suppliers should avoid any sort of child labor in their business operations consistent with the International Labor Organization's core labor standards and the United Nations Global Compact principles. That means that suppliers shall employ only workers with a minimum age of 15 or the applicable minimum legal age, whichever is higher.

##### **5.2 FREELY CHOSEN EMPLOYMENT**

Suppliers will not utilize forced, bonded, or indentured labor or involuntary prison labor.

##### **5.3 WORKING HOURS, WAGES AND BENEFITS**

Suppliers shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary. Suppliers shall ensure that all workers receive fair remuneration and guarantee the applicable national statutory minimum wage.



#### **5.4 FREEDOM OF ASSOCIATION**

Suppliers respect their employees' right to freedom of association under current laws as well as to bargain collectively.

#### **5.5 ANTIDISCRIMINATION**

Suppliers shall not discriminate against any worker based on gender, race, disability, ethnic or cultural origin, religion, belief, age, or sexual orientation.

### **6. HEALTH AND SAFETY**

Suppliers ensure the safety of all employees in the workplace and offer a working environment conducive to health that supports accident prevention and minimizes exposure to health risks to the Supplier's employees. When hazards cannot be completely avoided, suppliers will provide employees with appropriate personal protective equipment. Therefore, suppliers will have appropriate occupational health and safety management systems in place. Workers shall be provided with appropriate workplace health and safety training in their primary language. Health- and safety-related information shall be clearly posted in the facility.

### **7. QUALITY AND ENVIRONMENT**

#### **7.1 QUALITY**

We meet our customers' high expectations in terms of quality and safety. The zero-defect strategy is an integrated part of our Interroll Production System (IPS). It is one element of our Total Quality Management (TQM) implementation. Our customers should have no trouble during the quotation phase, order fulfillment, and the use of our products and services.

Suppliers will meet generally recognized or contractually agreed-upon quality requirements in order to provide goods and services that without exception meet Interroll's needs, perform as warranted, and are safe for their intended use.

#### **7.2 ENVIRONMENT**

Suppliers will comply with applicable laws and regulations on environmental protection and will preserve resources and protect the environment as much as possible. Suppliers shall develop, implement, and maintain environmentally responsible business practices. The aims are to minimize environmental impacts and continually improve environmental protection by setting up or using an environmental management system.

### **8. MANAGEMENT COMMITMENT**

Suppliers are encouraged to fulfill the expectations set forth in this Supplier Code of Conduct by allocating appropriate resources.

#### **8.1 COMPLIANCE WITH LAWS, RULES AND LEGAL REGULATIONS**

Suppliers will comply with any and all applicable laws, rules and legal regulations in the countries in which they operate and will maintain a system to monitor compliance with such laws, rules, and legal regulations.

#### **8.2 REPORTING IRREGULARITIES/CONCERNS**

Suppliers shall provide means for all employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner. Suppliers will investigate such reports and, if necessary, take remedial measures.



## 9. MONITORING, VIOLATIONS AND REVIEW

Interroll will assess its suppliers' compliance with this Supplier Code of Conduct, and any violations of this code may jeopardize the supplier's business relationship with Interroll, up to and including termination. In suspicious cases, Interroll has the right to ask for an audit.

Interroll reserves the right to reasonably change the requirements of this Supplier Code of Conduct due to changes of the Interroll Compliance Program. In such event, Interroll expects the supplier to accept such reasonable changes.

Should you have any questions or concerns regarding these guidelines, please contact Heinz Hössli, Group Chief Financial Officer, Interroll headquarters, phone +41 (0)91 850 25 44

These guidelines are valid from December 1, 2016.

Sant'Antonino, Switzerland, September 15, 2020

(Signature)

Heinz Hössli  
Chief Financial Officer  
Interroll Worldwide Group

## References

### 1) External Sources

- United Nations Global Compact <http://www.unglobalcompact.org>
- Universal Declaration on Human Rights <http://www.un.org/Overview/rights.html>

### 2) Interroll-specific Sources

- Interroll Group Code of Conduct <https://www.interroll.com/downloads/company/>
- Anti-Bribery and Anti-Corruption Guidelines <https://www.interroll.com/downloads/company/>