

# CODE OF CONDUCT

Summary for external parties

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This Code of Conduct summarises the principles that guide Trafag AG and defines the standards we expect from our business partners, including suppliers, distribution partners and service providers, where contractually applicable. It applies to Trafag AG and all its subsidiaries worldwide.

## Table of contents

1	Our principles .....	2
2	Human rights and fair working conditions .....	2
3	Health, safety, environment and sustainability (HSE/ESG) .....	2
4	Integrity in business dealings and anti-corruption .....	2
5	Fair competition and antitrust law .....	2
6	Export controls, sanctions and prevention of money laundering .....	2
7	Data protection, information security and intellectual property .....	2
8	Product quality, safety and compliance .....	2
9	Financial integrity and records .....	3
10	Responsible supply chain and materials .....	3
11	Respectful working environment .....	3
12	Company values and resources .....	3
13	Questions, reporting and protection against retaliation .....	3
14	Implementation and review .....	3
15	Concluding statement .....	3

## 1 Our principles

Trafag stands for precision, reliability, and responsible conduct. We comply with all applicable laws, in particular Swiss law, and act with integrity at all times. Safety, quality and trust are central to everything we do.

## 2 Human rights and fair working conditions

We respect internationally recognised human rights and expect the same from our business partners.

- No child labour, forced labour or compulsory labour
- No discrimination, harassment or unequal treatment; equal opportunities are promoted
- Fair remuneration and working hours in accordance with applicable laws
- A safe, healthy and respectful working environment
- Freedom of association in accordance with local law.

## 3 Health, safety, environment and sustainability (HSE/ESG)

We protect people and the environment and continuously improve our performance. Emissions, waste and resource consumption are minimised wherever possible. Hazards and incidents must be reported promptly, and prevention is prioritised.

## 4 Integrity in business dealings and anti-corruption

Our success is based on performance, not improper advantage.

- Bribery, kickbacks and inappropriate gifts or benefits are prohibited
- Gifts or invitations must be modest, business-related and transparently documented
- Conflicts of interest must be disclosed without delay

## 5 Fair competition and antitrust law

We comply with applicable competition and antitrust laws.

- No agreements with competitors on prices, markets, customers or offers
- No unlawful exchange of sensitive competitive information
- Violations may result in severe legal consequences

## 6 Export controls, sanctions and prevention of money laundering

We comply with applicable export control and sanctions regulations. Products, technologies, end uses, business partners and payment structures are reviewed on a risk-based basis. Suspicious transactions are rejected.

## 7 Data protection, information security and intellectual property

We protect personal data and confidential information in accordance with applicable data protection laws (including the Swiss Data Protection Act and GDPR, where applicable). Trade secrets and intellectual property are classified, secured and used or disclosed only by authorised persons.

## 8 Product quality, safety and compliance

Quality is non-negotiable. Our products meet agreed specifications and all applicable standards and regulatory requirements (e.g. ISO, CE, UL, ATEX, where relevant). Risks must be reported, documented and remedied without delay.

## 9 Financial integrity and records

All business transactions must be recorded completely, accurately and promptly. There are no hidden payments or slush funds. Company funds may only be used for authorised purposes and in accordance with the dual-control principle.

## 10 Responsible supply chain and materials

We expect our suppliers and partners to comply with this Code of Conduct or equivalent standards, including:

- Respect for human rights, occupational safety, environmental protection and anti-corruption principles
- Legally compliant and transparent material declarations (e.g. REACH, RoHS, conflict-free minerals, hazardous substances)
- Cooperation on traceability, CO<sub>2</sub> reduction and sustainability objectives

A risk-based due diligence approach may include self-disclosure, audits and corrective measures with defined deadlines. If improvements are not achieved, Trafag reserves the right to restrict or terminate the business relationship.

## 11 Respectful working environment

We foster an inclusive and respectful culture with zero tolerance for discrimination, bullying or sexual harassment. Managers are expected to intervene, and everyone shares responsibility for respectful conduct.

## 12 Company values and resources

Financial resources, equipment, materials, data and IT systems are company assets. Misuse or unauthorised private use is prohibited. Losses, misuse or security incidents must be reported immediately.

## 13 Questions, reporting and protection against retaliation

Questions or concerns regarding compliance, as well as suspected violations, should be reported promptly to supervisors, HR, the compliance department or designated reporting channels (e.g. hotline or ombudsman). Confidentiality is maintained to the greatest extent possible. Individuals who report concerns in good faith are protected from retaliation.

## 14 Implementation and review

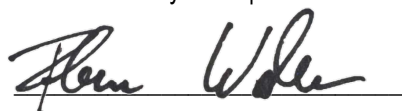
Managers are responsible for setting an example and ensuring appropriate training. Compliance is monitored, and violations may result in disciplinary or legal consequences. This Code of Conduct is reviewed regularly and updated as necessary.

## 15 Concluding statement

Integrity, precision and responsibility are the foundation of lasting partnerships. Together, we safeguard the trust of our customers, partners and society.

Signed for and on behalf of: Trafag AG

As of 5 January 2026 | H09006



Florian Wächter, Chief Operations Officer