

Code of conduct and Compliance policy of the hostettler group

The Code of conduct and the Compliance policy of the hostettler group stipulate the most important principles, ethical guidelines and standards, with which we comply in the hostettler group and thereby in the associated companies, and according to which we organise our economic activity. Independent adherence to the highest ethical standards of behaviour and the strict pursuit of all national and international laws that are relevant for us are at the core of our entrepreneurial activities. We place great importance on fair employment conditions and the defined high quality of the products.

Based on the Code of conduct and the Compliance policy, the hostettler group ensures effective compliance by means of appropriate instructions and associated processes.

The Code of conduct and the Rules of compliance apply to all employees of the companies of the hostettler group as well as to the members of the Board of Directors.

The following themes are examined: Laws, integrity, anti-corruption, international trade, fair competition, human rights, equality and diversity – people of colour, forced labour, child labour, sustainability, health and safety and data protection.

Laws

The hostettler group requests all employees to uphold the valid laws in their activities at all times.

Integrity

The hostettler group strives to act ethically and responsibly at all times. Our Code of conduct and our Rules of compliance are intended to prevent undesirable actions and promote high standards of integrity and compliance with all applicable laws and regulations by all individuals acting on behalf of the hostettler group. Therefore, whenever we request the provision of services in our name, we will always request that the provider, agent or consultant will also comply with our stipulations regarding the Code of conduct and the Compliance policy, or comply with comparable standards for conduct and compliance which ensure that such provider, agent or consultant also acts ethically and responsibly.

Anti-corruption

The hostettler group operates according to high ethical standards and acts in a considerate, goal-orientated and entrepreneurial way. Business partners are selected purely based on performance indicators. Decisions are always made in line with the hostettler group and never for reasons of personal gain. The hostettler group refuses any form of bribery and corruption and will act against any form of such. The applicable anti-corruption laws and provisions are upheld wherever we do business. Any attempt to influence a person via hospitality, entertainment or gifts in order to procure business is strictly forbidden.

International trade

The laws governing international trade are effective with regard to the transportation of goods, services and technology beyond national borders. It is our policy to strictly comply with these laws and provisions in countries in which we do business.

Fair competition

Compliance with competition law is part of the core values of the hostettler group. Our company does not tolerate any violations of competition law. To this aim, the hostettler group has implemented an extensive compliance programme to prevent that violations of competition law occur at all. AGON PARTNERS LEGAL AG acts as compliance office for this.

Human rights

We are committed to respect human rights and to comply with all applicable national and local labour laws in the countries in which we operate. In our business activities, we will observe all essential social aspects and respect fundamental labour standards.

Equality and diversity – People of colour

We respect the individual and make every effort to create a working environment that is characterised by equality and diversity. We do not accept any form of discrimination by or towards our own employees, others taking part in our activities, or those with whom we cultivate business relationships, irrespective of their origin, nationality, gender, skin colour, religion, age, political or trade union activity, sexual orientation, etc.

Forced labour

Any form of slavery, bonded labour and forced labour under the threat of punishment, or other means of coercion against the will, carried out in subjugation or an imprisoned person, is prohibited and will not be tolerated.

Child labour according to UNICEF

Child labour is defined as work for which children are too young or which is dangerous and exploitative, which causes physical or mental damage, or which prevents children attending school. It deprives children of their childhood and contravenes the rights of children, which are applicable worldwide. There is a differentiation between normal tasks, for example, in the household, legal employment of young people and the exploitation of children. Most states have specified a minimum age of between 14 and 16 years by law.

Sustainability

The protection of the environment and the preservation of natural resources are important to the hostettler group. The board of directors, the management team and employees are expected to carry out their work in an environmentally conscious way and to support the initiatives of the hostettler group for environmentally-friendly and sustainable ways of working.

Health and safety

We endeavour to create a healthy workplace for all employees with good working conditions and a suitable working environment. We are therefore committed to work arrangements that promote health, and we support preventative measures accordingly.

Data protection

The hostettler group is committed to the responsible handling of personal data. Accordingly, compliance with the Swiss Federal Act on Data Protection (FADP), the Ordinance to the Federal Act on Data Protection (DPO), the Telecommunications Act (TCA) and other data protection regulations that may be applicable, in particular the EU General Data Protection Regulation (GDPR), is binding for the hostettler group.

The hostettler group designates a professionally independent data protection consultant, who is not bound by any instructions, to oversee and support internal compliance of the data protection regulations and maintain a record of the processing activities. According to Art. 27 in conjunction with Art. 3 para. 2 GDPR, a representative entrusted with data protection and domiciled in the EU must be designated. Therefore, in accordance with Art. 27 para. 3 GDPR, the hostettler group designates ecolaw.de - Gesellschaft für Datensicherheit & Datenschutz GmbH, domiciled in Germany, as its representative.

Conclusion

The Code of conduct and the Compliance policy have been adopted by the Board of Directors of hostettler ag sursee and are to be communicated to all employees worldwide. We expect all employees to strictly comply with these and the instructions associated with it.

In addition to the Board of Directors and the group management, each individual employee is also responsible for implementing and upholding it. The hostettler group believes that compliance with this Code of conduct and the Compliance policy as well as the associated instructions will contribute to further expanding the market position and thereby increasing the value of the company.

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The Code of conduct and the Compliance policy of the hostettler group were originally published in German language. Any discrepancies or differences resulting from the translation are not binding and have no legal effect. For any questions related to the accuracy of the information contained in the translation, we refer to the German version, which is the official and only binding version.