cicor

Cicor Group

Business Partner Code of Conduct

English

November 2024 Version

Introduction

The Cicor Group (hereinafter named as "Cicor") is committed to act in accordance with the ethical, social and environmental standards and to treat others with dignity and respect. We expect our suppliers, manufacturers, service providers and all our other partners (the "Business Partner") to act in the same manner.

The relationship between Cicor and its business partners of all kinds is an important component to building sustainable business success. The term "Cicor" as used herein comprises Cicor Technologies Ltd. and all its affiliated companies. This Code of Conduct is binding for all companies of the Cicor Group (together named as "Cicor" hereinafter).

Cicor expects from its business partners full compliance with all applicable laws and regulations of the countries in which the Business Partners' operations are managed, goods are handled and/or services are provided. This Code is issued to ensure that business activities should only be conducted in full compliance with legal requirements and consistent with ethical values and principles, which are based on the United Nations Universal Declaration of Human Rights, the International Labour Organisation Convention and the OECD Guidelines for Multinational Enterprises.

In addition, the Cicor Business Partner Code of Conduct (hereafter referred to as the "Code") formalizes the expectations that Cicor holds for its business partners and throughout the whole business relationship. Whilst Cicor recognizes differences in cultures and legal requirements, Cicor expects that wherever the business partner is located, all businesses are to be conducted, as a minimum standard, in a manner compatible with this code.

Our Core Values

Each of the following chapters shared builds upon the Core Values of Cicor defined as

1) **Customer Focus**
2) **High Performance**
3) **Trust**
4) **Collaboration**
5) **Integrity & Respect**

Our Core Values lie at the heart of Cicor and help us define not just what we do but also how we do it. Our collective mission is to live these values in everything we do, every day.

Speak Up

Cicor is committed to maintain a trusting and open-mined environment promoting a Speak-Up culture. Our stakeholders can raise concerns through our Cicor Integrity Line at any time.

All details about our Integrity Line can be found on our website.

cicor.com/integrity

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Business Ethics

Compliance with Laws

Business Partners must comply with all laws and regulations applicable to their business, including the local laws and regulations of all countries outside their home country in which operations are managed or services are provided. Legal Compliance is the foundation for all actions and applies to all activities of our company and employees without exception.

Ethics Programme

Policies and Code of Conduct

Cicor expects Business Partners to implement and adhere to their own written code of conduct, containing the expectations of this Code as a minimum standard, and to flow down their principles to the business partner they work with in providing goods and/or services. Cicor expects Business Partners to maintain effective programs that require their employees to make ethical, value driven choices in their business dealings including developing an employee code of conduct and supporting training.

Help and Guidance

Cicor expects Business Partners to provide employees and third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting. We expect business partners to take action to prevent, detect and correct retaliatory actions.

Fair Competition & Transparent Business Relationships

We will only conduct business with business partners who, upon reasonable review, are deemed to be of integrity and whose legal compliance of their actions is beyond a doubt. It is vital that laws regarding money laundering are always complied at with. Consultant and brokers will only be used in compliance with applicable laws. Compensation will only be paid for services rendered. The compensation amount must be reasonable relative to the services provided.

Anti-Corruption
Complying with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business regardless of any local customs. This also includes compliance with anti-corruption laws that may have extra-territorial application.

Cicor expects from Business Partners to conduct reasonable due diligence to prevent and detect bribery and corruption in all business arrangements, including partnerships, the engagement of contractors and sub-contractors, joint ventures, offset agreements, and hiring of third-party intermediaries such as agents or consultants.

Illegal Payments
Business Partners must not offer any illegal payments to, or agree to receive any illegal payments from a customer, Business Partner, their agents, representatives or others. Cicor expects from Business Partners to prohibit their employees from receiving, paying, and / or promising sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage.

Fraud and Deception
Business Partners must not to seek to gain an advantage of any kind by acting fraudulently, deceiving people, making false claims or allowing anyone else representing them to do so. This includes defrauding or stealing and any kind of misappropriation of property or information.

Competition and Antitrust
Entering formal or informal anti-competitive arrangements that fix prices, collude, rig bids, limit supply or allocate/control markets is not allowed. They must not exchange current, recent or future pricing information with competitors. Business Partners must not participate in a cartel or any activity that would unlawfully restrain or impact competition.

Gifts / Business Courtesies
Cicor expects Business Partners to compete on the merits of their products and services. Business Partners must not use the exchange of business courtesies to gain an unfair competitive advantage. In any business relationship, Business Partners must ensure that the offering or receipt of any gift or business courtesy is permitted by applicable laws

and regulations, and that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices. No cash gifts or cash equivalent should be offered or accepted.

Conflict of Interest

Cicor expects Business Partners to avoid all conflicts or interest or situations giving the appearance of a potential conflict of interest. Business Partners will provide immediate notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of Cicor and personal interests of those of close relatives, friends or associates.

Product Safety & Quality

We expect Business Partners to comply with all laws and regulations on product safety and quality whilst delivering products and/or services to agreed product safety and quality standards. Cicor expects Business Partners to have in place quality assurance processes to identify any defects and implement corrective actions.

Global Trade Compliance

Import
All our business Partners must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components, technical data and services.

Export & Sanctions
All our business Partners must ensure that their business practices are in accordance with all applicable laws, directives and regulations including economic sanctions and embargos, governing the export and transfer of parts, components, and technical data and services. Business Partners have to provide truthful and accurate information obtain export licences and/or consents where necessary.

Responsible Sourcing of Minerals
Cicor expects Business Partners to provide products made from materials, including constituent minerals that are sourced responsibly and support efforts to eradicate the use of any minerals which directly or indirectly finance or benefit armed groups that are perpetrators or of serious human rights abuses. Cicor expects Business Partners to conduct due diligence and provide supporting data on their sources and supply chain of custody for these minerals when requested. In the event that the material "chain of custody" supplied id "indeterminable" or otherwise unknown the Business Partner is expected to either attain the appropriate certifications, or phase out that material.

Counterfeit Parts
Cicor expects Business Partners to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of counterfeit parts and materials being delivered. Effective processes have to be in place to detect, report and quarantine counterfeit parts and materials and to prevent such parts re-entering the supply chain. If counterfeit parts and/or materials are detected or suspected, Business Partners must provide immediate notification to the recipients of such counterfeit parts and/or materials.

Maintain Accurate Records

Cicor expects Business Partners to have in place appropriate controls to create, maintain and store business records, and not to alter any record entry to conceal or misrepresent the underlying transaction represented by it accurately and securely. All records, regardless of format, made or received ad evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

Management of Risk

Cicor expects Business Partners to actively manager their risks and not to pass down those risks inappropriately to subcontractors or third parties. Business Partners share information on relevant risks to ensure risks can be mitigated.

Data Protection

Cicor expects Business Partners to ensure that all sensitive, confidential and proprietary information is appropriately protected. Business Partners must comply with applicable data privacy laws on the collection, processing and transfer of personal data an information. Business Partners must not use information for any purpose other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information. Business Partners must protect sensitive, confidential and proprietary information of others, including personal data/information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures, including mitigating emerging risk to information systems by implementing appropriate IT cyber security programmes.

Business Partners must comply with all applicable laws governing intellectual property rights assertions, including protection against disclosure. Business Partners and their personnel must not illegally use any material or non-publicly disclosed information obtained in the course of their business relationship with Cicor as the basis for trading or for enabling others to trade in the stock or securities of any company.

Payment of Taxes

Business Partners must ensure they comply with all applicable tax laws and regulations in the countries where they operate and shall strive to be open and transparent with the tax authorities. Under no circumstances should Business Partners engage in deliberate illegal tax evasion or facilitate such evasion on behalf of others.

Timely Payment of Business Partners

Cicor expects Business Partner to be fair and reasonable in their payment practices and pay undisputed and valid invoices on time in accord-ance with agreed contractual payment terms.

Confidentiality

The Business Partner are be obliged to treat confidential information and know-how of the Cicor Group strictly confidential, protect it from unauthorized access and only disclose I to a third party with the written approval from Cicor.

Social

Protection Human Rights

Cicor expects Business Partners to conduct their business and operations in a way that respects human rights by treating their own workers, and people working for their Business Partners, with dignity and promoting fair employment practices. This includes providing fair and competitive wages, prohibiting harassment, bulling and discrimination, prohibiting use of child, forced, bonded or indentured labour and not engaging in trafficking of persons for any purpose. The protection of human rights in accordance with the United Nations Universal Declaration of Human Rights will be respected both within the company and with business partners, and in the company's presence in the public sphere. The principles of the International Labor Organisation ("ILO") regarding the basic principles and rights at work will be respected company-wide / group wide in particular, we highlight the following:

Child Labour

Business Partners are expected to ensure that illegal child labour is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the international labour organization (ILO), whichever is higher.

Modern Slavery or Forced Labour

Business Partners must prevent any involvement in all forms of modern slavery, including human trafficking, forced, bonded or indentured labour. All work should be voluntary on the part of the employee.

Cicor expects Business Partners to be compliant with local labour law regulations and international standards. It is expected to provide employees with a written contract in a language they understand clearly indicating their rights and responsibilities with regard to wages, working hours, benefits and other working and employment conditions

according to local labor law. Business Partners must not retain any form of employee identification (passports or work permits), nor destroy or deny access to such documentation, as condition of employment unless required by applicable law. Business Partners must not charge employees fees, recruitment costs or deposits, directly or indirectly as precondition of work.

Business Partner must respect the right of workers to terminate their employment after reasonable notice and to receive all owed salary. Business Partners must respect the right of workers to leave the workplace after their shift. The ILO Convention No. 29 and 105 apply.

Fair Working Conditions

Diversity and Inclusion
Cicor expects Business Partners to foster a diverse and inclusive work environment where employees are treated with respect and fairness. It is expected to provide equal employment opportunity to employees and applicants for employment without discrimination and comply with all applicable non-discrimination law and regulations. It must be ensured that employment, including hiring, payment, benefits, advancement, termination and retirement, is based on ability and not any personal characteristics such as the persons gender, origin, nationality, religion, union affiliation etc. The same compensation will be paid to female and male employees for equivalent work.

Discrimination, Harassment and Bullying
Discrimination due to gender, ethnic origin, religion, age, disability, citizenship, sexual orientation, socio-economic class or other reasons that are prohibited by law will not be tolerated. Cicor expects Business Partners to ensure that their employees are afforded an employment environment that is free from physical, psychological, sexual and verbal harassment, intimidation or other abusive conduct. The ILO Conventions No. 100 and 111 apply.

Wage, Benefits & Working Hours
Employees must be paid at least the minimum compensation required by local law and provide all legally mandated benefits as well as fringe benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required or, in those countries

where such laws do not exist, at least equal to their regular hourly payment rate. Any deduction from wages as a disciplinary measure must not be permitted nor it's permitted to deduct any other fees which are not provided by local law. Employees should be provided with regulated hours of work, daily and weekly rest periods and annual leave at least to the extent required by local law.

Health and Safety

Establishing an appropriate safety management system including policies aimed at protecting health, safety and welfare of employees, contractors, visitors and others who may be affected by their activities by striving to eliminate fatalities, work-related injuries, health impairment and limit exposure to safety hazards is a requirement. Business Partners should take reasonable steps to provide a hygienic working environment and must ensure that employees performance and safety is not impaired by alcohol, controlled substances, legal and illegal drugs.

Disciplinary and Grievance Mechanism

Employees have the possibility to address concerns regarding employee work, conduct or absence. It is expected by Cicor that Business Partners have a grievance mechanism for employees to raise a workplace problem or concern or to appeal a disciplinary decision.

Environmental Responsibility

Cicor expects Business Partners to conduct their business in a manner that actively manages environmental risks across their operations, products and supply chain. An appropriate environment management system including policies and procedures aimed at effectively managing their environmental performance, including integrating environmental considerations into their product or services should be established. In addition, the Business Partner have to take suitable and appropriate measures to continuously improve the protection of the environment and resources throughout the entire supply chain, in particular by introducing appropriate environmental management systems based on international standards.

Compliance communication with Cicor

Duty to Inform

A Business Partner immediately informs Cicor in writing as soon as the Business Partner becomes aware of has sufficient reason to assume that the Business Partner or one of its sub-Business Partners in its supply chain is in breach of the Code or its own Code of Conduct, unless as an impact on the business relationship between Cicor and the Business Partner can be excluded. Aforesaid duty to inform applies in particular in case of a Business Partner or one of its sub-Business Partners being subject to official investigations by competent authorities or to court proceedings and at least one of the reasons is a non-compliance with standard that are the same or similar the ones established by the code.

Validity Along the Value Chain

Compliance with the contents of this Code of Conduct will become a binding component of the business relationship. We will also promote the idea to adopt this Code of Conduct.

Business Partner Self-Assessment and Audit

For evaluation purposes Cicor is entitled to request from the Business Partner the completion of a suitable Business Partner self-assessment, including updates of an already given self-assessment. The Business Partner will co-operate as far as it can reasonably be expected. Invitation and questionnaires for suppliers are requested by Cicor and its supply chain compliance tool (Integrity Next) are expected to be answered within the deadline as mentioned by Cicor. If there is reason to suspect that this Business Partner Code of Conduct has been violated in a significant way, Cicor reserves the right to request written information.

In addition, Cicor reserves the right to check compliance with these principles as part of customary or contractually agreed-upon supplier audits. If there is reason to suspect a violation, Cicor shall have the right to conduct an unscheduled audit.

Requests for information and on-site audits shall protect the interests of the contract partner and employees, in particular with regard to trade and business secrets as well as compliance with data privacy rules.

Suspension and Termination of Contracts & Corrective Measures

In the event of an Non-Compliance Case, Cicor is entitled to immediately suspend any affected contract/s and any performance thereunder until the Non-Compliance Case has been remedied or been solved with a documented corrective action or in another way. Cicor is further entitled to terminate any affected contract/s with immediate effect, if the Non-Compliance Case is of a kind that it cannot be remedied or solved the Business Partner refuses or does not take any corrective action or fails to remedy the non-Compliance Case within reasonable period set by Cicor, or it is a repeated or severe Non-Compliance Case and Cicor cannot reasonably be expected to continue the affected contract/s.

The aforesaid rights are without prejudice and in addition to any rights Cicor is entitled to under contract or applicable law because of a Non-Compliance Case committed by a Business Partner, in a particular with regard to claim damage compensation or indemnification.

Confirmation

The Business Partner hereby declares that it will comply with the obligations of this Business Partner Code of Conduct. In addition, the Business Partner will adequately address the principles, standards and requirements set out herein along its supply chain and take them into account when selecting its suppliers.

Place, Date

Name of supplier

Supplier signature 1 sign here

Supplier signature 2 sign here

Report a concern

Integrity Line
Anonymous reporting possible.
cicor.com/integrity

by e-mail
compliance@cicor.com

by mail
Cicor Management AG
Compliance Office
Gebenloostrasse 15
9552 Bronschhofen
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