



Cicor Group

# Employee Code of Conduct

English

October 2024 Version



# Contents

Introduction.....	3
-------------------	---

Legal and Compliance.....	3
---------------------------	---

Speak Up.....	4
---------------	---

Our Core Values.....	4
----------------------	---

## People

Human Rights & Child Labour.....	5
----------------------------------	---

Labour Relations .....	6
------------------------	---

Diversity and Inclusion.....	7
------------------------------	---

Health & Safety.....	8
----------------------	---

Leadership .....	8
------------------	---

## Business Integrity

Anti-Bribery & Corruption .....	9
---------------------------------	---

Illegal Payments .....	10
------------------------	----

Fraud and Deception .....	11
---------------------------	----

Competition and Antitrust .....	11
---------------------------------	----

Gifts / Business Courtesies .....	11
-----------------------------------	----

Insider Trading.....	11
----------------------	----

Competing Fairly .....	11
------------------------	----

Conflict of Interest .....	12
----------------------------	----

Product Safety & Quality.....	12
-------------------------------	----

Global Trade Compliance,	
--------------------------	--

Sanctions & Embargoes .....	12
-----------------------------	----

Import.....	12
-------------	----

Export & Sanctions .....	13
--------------------------	----

Anti Money Laundering and Tax Evasion	13
---------------------------------------	----

Maintaining Accurate Records.....	14
-----------------------------------	----

Data Privacy and Digital Ethics.....	14
--------------------------------------	----

Counterfeit Parts .....	14
-------------------------	----

Protect our Assets.....	14
-------------------------	----

## Community

Managing our Communications.....	16
----------------------------------	----

Community Impacts.....	16
------------------------	----

Training and Awareness.....	16
-----------------------------	----

Responsible Sourcing .....	16
----------------------------	----

Environment.....	16
------------------	----

Signature Page.....	17
---------------------	----

Report a Concern.....	18
-----------------------	----

# Introduction

The Cicor Group (hereinafter named as “Cicor” or “the Company”) is a global company with a unique technology and service portfolio. We aim to create added value for our employees, customers, and shareholders. At Cicor we are eager to be a reliable, fair and respectful employer and business partner. Our Code of Conduct shares insights to our ethical

principles and values. Whilst Cicor recognises differences in cultures and legal requirements, the Company expects that wherever a stakeholder is located, all businesses shall be conducted, as a minimum standard, in a manner compatible with this Code.

# Legal and Compliance

Cicor is required to comply with national regulation of the countries the Company operates and international standards, regardless of the prevailing permissive business practices. Our compliance & sustainability program ensures a group and entity-

based risk management with respective checklists and documentation in place. It is required by every Cicor entity and its employees to comply with this Code of Conduct, national regulations as well as international standards.

# Speak Up

The Company is committed to maintain a trusting and open-minded 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](https://cicor.com/integrity)

# Our Core Values

The chapters of this Code of Conduct are organised around the topics of People, Business Integrity, and Community. Each chapter builds upon the core values of the Company 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.

# People

## Human Rights & Child Labour

Human Rights are inherent to everyone whatever their nationality, place of residence, gender, national or ethnic origin, religion, or any other similar status. We have a zero-tolerance approach to all forms of human rights abuses, including modern slavery and child labour within our business, operations, and value chain. At Cicor we treat everyone with dignity and respect. We ensure that our employees know how to identify and report all forms of human right abuses with regular training and raising awareness.

Cicor expects business partners, shareholders, and employees to conduct their business and operations in a way that respects human rights by treating anyone with dignity and promoting fair employment practices. This includes providing fair and competitive wages, prohibiting harassment, bullying, and discrimination, prohibiting use of child, forced, bonded or indentured labour and not engaging in trafficking of persons for any purpose. Any involvement in all forms of modern slavery,



including human trafficking, forced, bonded or indentured labour is not tolerated.

Cicor does not support any form of illegal child labour. 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.

### **Labour Relations**

Cicor provides all employees with a written contract in a language they understand clearly indicating their rights and responsibilities regarding wages, working hours, benefits and other working and employment conditions. Any form or retention of employee identification (passports or work permits), nor destroying or deny access to such documentation as condition of employment, is strictly prohibited, unless required by applicable law.

Cicor ensures that their employees are afforded an employment environment that is free from physical, psychological, sexual, and verbal harassment, intimidation, or other abusive conduct.

Employees shall not be charged with any fees, recruitment costs or deposits, directly or indirectly as precondition of work. The right of employees to terminate their employment after reasonable notice and to receive all owed salary must be respected.

We respect the right of workers to leave the workplace after their shift. By committing to comply with the International Labour Organization (ILO) the Company recognises the rights of employees to form, join, and be active in trade unions and employee representative bodies in accordance with national laws, collective bargaining agreements and local customs.

We favour social dialogue to support fair and equitable treatment of all our employees. At Cicor we agree on training measures for employees that allow our workforce to develop professionally and enhance our competitiveness as a Company.



Workers receive at least the minimum compensation required by local law and all legally mandated 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.

It is not permitted to deduct wages as a disciplinary measure nor any other deductions which are not provided by local law. Cicor provides employees with regulated hours of work, daily and weekly rest periods, and annual leave at least to the extent required by local law.

### **Diversity and Inclusion**

We foster a diverse and inclusive work environment where employees are treated with respect and fairness. With employees around the globe diversity is a core part of our identity. We recruit, select, and develop our people on merit, irrespective of their race, colour, religion, gender, age, sexual orientation, material status disability or any other similar status.



We strive to create an inclusive workplace where differences are embraced and where we leverage our differences to achieve better business outcomes. Regardless of where someone comes from. We support professional development. Our success depends on our employees' success.

### Health & Safety

At Cicor we are committed to pursue the highest standards of health and safety. Our priorities are

- Protecting our people and the business from health and safety risks that could arise from our work activities
- Fostering a health and safety culture in which we all accept appropriate responsibility for ourselves and others and
- Ensuring good management of work-related health, safety and well-being as an ethical imperative.
- We identify and mitigate health and safety risks before we start our work.
- We aspire to zero work-related injuries or instances of ill-health.

- Reasonable steps should be taken to provide a hygienic working environment and
- ensure that employees performance and safety is not impaired by alcohol, controlled substances, legal and illegal drugs.

### Leadership

We recognise that leaders are everywhere: transforming the Company pulling the organisation forward, influencing others to pursue collective goals, empowering, and coaching teams, and investing energy to drive performance. We rely on team leaders and managers at every level of the Company to accept responsibility for instilling a culture of integrity within Cicor. We value, support and develop others, by thinking and acting as authentic team player and managing risks or conflicts proactively. We are genuine and humble, act with integrity and respect different point of views.



# Business Integrity

## Anti-Bribery & Corruption

At Cicor we have a zero tolerance for any form of bribery or influence peddling. We do not offer, pay, or accept bribes for any purposes, either directly or indirectly or through a third party. We do not make facilitation payments or permit others to make them on our behalf. Before offering and accepting any gifts or hospitality we ensure that the value is reasonable and allowed under the internal policies and standards, and that the gift or hospitality will not be viewed as improperly influencing a business decision.

Interactions with government officials or state organisations present risks that must be adequately addressed. We conduct business with the highest integrity, always consistent with anti-bribery laws and our internal policies and standards.

Should someone become aware of any request or solicitation made by a customer, supplier or other stakeholder the Company should be informed immediately. At Cicor we ensure that our employees have an understanding for any form of corruption and bribery by regular training on the topic.

Cicor expects stakeholders 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. The following procedures are defined as bribery or corruption:

### Illegal Payments

Defined as any offer of an illegal payment to or agree to receive any illegal payments from a customer, supplier, their agents, representatives, or others. It is prohibited to receive, paying, and / or promising sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage. This prohibition applies even in locations where such activity may not violate local law.

At Cicor we do not accept any offer, promise, or any improper payments of money or anything of value to government officials, political parties, candidates for public office or other persons. This includes a prohibition on so-called facilitation or grease payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance unless there is a formal legal governmental fee schedule for such expediting services and the government provides receipts. Personal safety payments are permitted where there is an imminent threat to health or safety.



### **Fraud and Deception**

Cicor denies gaining 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**

Any intention to enter formal or informal anti-competitive arrangements that fix prices, collude, rig bids, limit supply or allocate/control markets. Any exchange of current, recent, or future pricing information with competitors is prohibited. We do not participate in a cartel or any activity that would unlawfully restrain or impact competition.

### **Gifts / Business Courtesies**

Cicor expects employees to compete on the merits of their products and services. Employees must not use the exchange of business courtesies to gain an unfair competitive advantage. In any business relationship, employees 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 organisation and are consistent with reasonable marketplace customs and practices. No cash gifts or cash equivalent should be offered or accepted by our employees.

### **Insider Trading**

Inside information is generally information that is non-public and that could have an impact on the share price of the Company. Employees maintain the confidentiality of any inside information to which they have access in order to avoid any accidental disclosure.

### **Competing Fairly**

Competition laws are in force around the world to prevent agreements and practices that may significantly alter or unduly restrict competition in the market. We do not obtain competitive intelligence by illegal or unethical means, including through bribery. When working with stakeholders we will not seek unauthorised access to material and will handle information in accordance with the appropriate legislation, policies, and processes. We do not exchange pricing methods, policies, margins or terms of conditions or any similar information with competitors.

### **Conflict of Interest**

Cicor avoids all conflicts of interest or situations giving the appearance of a potential conflict of interest. In any circumstances such kind of conflict may arise the Company shall be informed immediately. This includes a conflict between the interests of Cicor and personal interests of those of close relatives, friends, or associates. We do not allow personal interests to interfere, or appear to interfere, with our ability to make fair and objective decisions when performing our jobs in the best interest of Cicor.

### **Product Safety & Quality**

The Company complies with laws and regulations on product safety and quality whilst delivering products and/or services to agreed product safety and quality standards. Cicor expects stakeholders to have in place quality assurance processes to identify any defects and implement corrective actions.

### **Global Trade Compliance, Sanctions & Embargoes**

Governments establish export control laws and impose sanctions and embargoes in pursuit of several interests including national security and preventing arms proliferation. It is fundamental that Cicor complies to these regulations and laws as any violation may have serious consequences, including business disruption and fines. Before working or transacting with any third party or engaging any export, re-export or transfer of controlled item the Company ensures compliance with export and import control laws within the relevant jurisdictions.

### **Import**

The Company ensures 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**

The Company shares a non-tolerance procedure for any stakeholder listed as part of a sanction list. Cicor does not conduct business to any party listed on an Embargo or Sanction list according to the Companies internal processes.

### **Anti Money Laundering and Tax Evasion**

Cicor is committed to fully complying with applicable anti-money laundering (AML) and counterterrorism financing laws and will only accept funds received from legitimate sources. In addition the Company only conducts business with reputable customers involved in legitimate business activities. Cicor rejects doing business in any way that assists or facilitates tax evasion by our supplier, our customers or other third parties. We ensure that our AML and Know Your Customer Due Diligence is performed on all potential new customers. We confirm that funds of existing customers are derived from legitimate business activities and we pay particular attention to customers that are controlled by public officials or politically exposed persons (PEPs).



### **Maintaining Accurate Records**

Our regulators require us to maintain accurate records. If we do not, we face severe penalties and risk adversely affecting our shareholders and our employees. Therefore we must ensure that the business information we create is accurate, timely, complete, fair and understandable. We have internal procedure and control measures in place for maintaining our financial records. How we maintain and destroy documents is in accordance with legal requirements and our internal procedures.

### **Data Privacy and Digital Ethics**

We are committed to protect the privacy of individuals and to comply with applicable personal data protection laws. In addition, digital technologies are becoming increasingly important in our Company and our professional lives. While leveraging new digital technologies to enhance our business performance and customer satisfaction we also commit that our employees will benefit from this development.

### **Counterfeit Parts**

Cicor expects employees to develop, implement, and maintain effective methods and processes appropriate to their products to minimise the risk of counterfeit parts and materials being delivered. Effective processes should 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, employees should provide immediate notification to the recipients of such counterfeit parts and/or materials.

### **Protect our Assets**

We each have a duty to protect the assets of Cicor, including physical property, confidential information, and intellectual property against theft, damage, misuse and improper disposal. This includes:

- Any kind of documents
- Any kind of confidential information
- Physical assets such as office furniture, computers, or similar



- Additionally, we have a duty to protect assets entrusted to us by a third party with whom we work with. Where Cicor employees are granted access to government classified information any exchange or transmission of classified information or material must comply strictly with the required security processes and clearances. Any actual or suspected incident or misuse should be reported immediately.

You may share sensitive information with a third party, but only if a non-disclosure agreement (NDA) is in place prior to communication of any confidential information. In addition you must not solicit, accept or use third parties proprietary information, whether provided by the customer or otherwise, unless the owner of the data has agreed to its release and use.



# Community

## **Managing our Communications**

The Cicor brand and reputation is one of our most valuable asset. We must promote and protect our brand coherently, consistently and accurately to maintain our strength in the market.

## **Community Impacts**

We seek to contribute to the economic development and social well-being of communities by partnering with local stakeholders and by encouraging employees to donate their time with worthy causes.

## **Training and Awareness**

As a Company we share knowledge. Regular workshops and training sessions are part of our strategy to improve not just our quality but also to build awareness. Training and knowledge sharing is a crucial part for our improvement and daily business.

## **Responsible Sourcing**

Cicor provides 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. The Company has a process in place to foster responsible sourcing.

## **Environment**

As a Company we have a responsibility to the global community to protect the environment in our operations and throughout our value chain. We must comply with and strive to exceed all applicable environmental laws and regulations wherever we do business. We are striving to reduce our emission footprint and contribute towards a sustainable future with an emission reduced and balanced carbon footprint in line with the goals of the Paris Agreement.

# Signature Page

I hereby certify that I have received, understand and will comply with the Code of Conduct.

Place, Date

Name

Signature

sign here

# Report a Concern



## **Integrity Line**

Anonymous reporting possible.  
[cicor.com/integrity](https://cicor.com/integrity)

## **by e-mail**

[compliance@cicor.com](mailto:compliance@cicor.com)

## **by mail**

Cicor Management AG  
Compliance Office  
Gebenloostrasse 15  
9552 Bronschhofen  
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Cicor Group



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