



Code of Conduct

Dear Datwyler Associates

More than 100 years of innovation for the benefit of our customers, employees, shareholders and other stakeholders – that is the hallmark of Datwyler. Over this period, Datwyler has evolved from a family-owned Swiss company into an international group. Building on our strong roots, we have developed our own style with high standards and unique values:

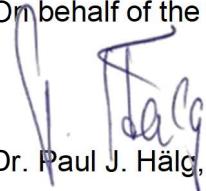
- We are entrepreneurs.
- We bring value to our customers.
- We excel in what we do.
- We have respect for others.

While the social and economic environment is changing at an ever-faster pace, we want to uphold the strengths of Datwyler. This makes it vital to establish clear guidelines summarising our continuously grown standards. The Code of Conduct below sets out those same standards of conduct that our employees have always applied using good common sense.

We are convinced that these traditional basic values are regaining importance in our continually globalising world and that they will be an additional competitive advantage. Based on this conviction, Datwyler has joined the UN Global Compact in 2009. As we strive for growth and success, we also strive for greater responsibility and environmental awareness in all that we do. That's why sustainability has always been an integral part of the long-term business strategy of Datwyler. Examples of our commitment include the membership in the UN Global Compact program, our Human Rights Policy, our global Code of Conduct, or our Sustainability Report, created in conformance with globally accepted guidelines and published periodically.

For us as an international group with companies and sales activities around the world, it is important to lay down binding standards of conduct that we expect and to take appropriate disciplinary action in the event of any violations. As in the past, we are confident that everyone who works for Datwyler will adhere to the highest standards of ethical behaviour. If any unclear situations arise in day-to-day business activities, this Code of Conduct will provide practical guidance. We are counting on you!

On behalf of the Board of Directors



Dr. Paul J. Hälg, Chairman

On behalf of the Executive Board



Dirk Lambrecht, CEO

Altdorf, 27 June 2008, updated on 1 January 2014, 2 February 2018, and 14 December 2023

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1. Background

Datwyler (the “Company”) focuses on high-quality, system-critical elastomer components and holds leading positions in attractive global markets such as healthcare, mobility, connectivity, general industry, and food & beverage. Datwyler materializes ideas for a safer, smarter and more sustainable world. Thanks to recognized core competencies, the company offers added value to its customers as a development partner. Its strategic priorities of profitable growth, sustainability, agility and digitalisation make Datwyler an attractive partner for all stakeholders.

We seek to sustain profitable growth for the benefit of our customers, employees, shareholders and all other stakeholders. This is the foundation on which we add value in the long term and preserve the corporate independence of the Datwyler Group. As a competent development partner, we maintain close contact with our customers, deliver the highest quality and provide satisfaction with innovative services. Every Datwyler employee is committed to contributing to our customers’ success in their markets.

2. Principles and objectives

The Code of Conduct contains binding rules that apply to all employees of all Datwyler companies, subsidiaries and brands worldwide. They are designed to help deal with ethical and legal challenges in our day-to-day work. All employees may speak to their supervisor or the manager of the local company at any time if they have questions or concerns relating to the Code of Conduct.

3. Basic principles of conduct for all employees

3.1 Compliance with laws

Compliance with laws is the top priority for our Company. All employees must respect and obey the laws and regulations of the jurisdiction in which they operate. Violating the law must be avoided under all circumstances. Besides the penalties imposed by law, all employees guilty of a violation can expect disciplinary action, up to and including dismissal, for breach of their obligations under their employment contract.

3.2 Commitment to respect human rights

Datwyler is committed to high standards of business ethics and integrity, including the support and respect of internationally recognized human rights and labour standards (such as the United Nations Guiding Principles on Business and Human Rights or OECD's Guidelines for Multinational Enterprises), as expressed in our dedicated Human Rights Policy, including the dignity, privacy and personal rights of every individual. We work with people of different origins, nationalities, cultural backgrounds, political and religious convictions, skin colour, age, sexual orientation, language, health or disability conditions, and marital status, nurturing a culture of mutual respect and trust. We will not tolerate any form of discrimination, humiliation, oppression, harassment or offence, and categorically reject any form of child and forced labour.

We are open and honest, act with integrity and take responsibility for our actions. We are reliable partners and do not make promises we cannot keep. These principles apply both to the way we interact with each other within the Company, to our conduct in dealings with external partners, and to our expectations from external partners dealing with Datwyler (e.g., suppliers).

3.3 Upholding the reputation of Datwyler

The reputation of Datwyler largely depends on the behaviour and conduct of each one of us. Inappropriate behaviour or conduct of even a single employee can cause serious harm to the Company. All employees are required to uphold Datwyler's public image. Everything they do in the performance of their duties must be guided by this principle. Rules for the use of social media platforms by Datwyler employees are set out in separate Social Media Guidelines.

3.4 Coordinated external communications

Datwyler maintains an open dialogue with all stakeholders. As a publicly listed company, Dätwyler Holding Inc. fosters relationships with investors, banks and media representatives, in particular, to promote the interests of shareholders. Communication takes place through the Annual Report, Interim Report, Annual General Meeting and at least one press and analyst conference every year. Through press releases and on its website, Datwyler provides up-to-the-minute information on all important projects as required by the ad hoc publicity rules of the SIX Swiss Exchange.

To ensure that all stakeholders are treated equally as required, it is critical that communications with members of the daily, business and financial media are coordinated by Corporate Communications and our press spokesperson. All media inquiries must be referred to these staff of Dätwyler Holding Inc. This does not apply to inquiries from trade media members concerning technical matters. Specific guidelines for dealing with the media are set out in a separate Communication Manual. The corporate design guidelines must be followed at all times when using any communication tools.

3.5 Prohibition of fraud and money laundering activities

All employees cannot accept nor engage, directly or indirectly, in any form of fraud, including but not limited to deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts, collusion or any other form of benefit for the purpose of influencing decision making in violation of law.

All employees cannot accept or engage, directly or indirectly, in any form of money laundering or terrorism financing activity.

4. Attractive employer

4.1 Modern corporate governance

As a company committed to creating long-term value, Datwyler has a clear framework of sound organisational, management and control policies. These policies are set out in the Articles of Association, Rules of Organisation and Business Conduct, and the Delegation of Group Management Responsibilities of Dätwyler Holding Inc. They ensure compliance with modern principles of good corporate governance and are published each year in the Annual Report and on our website in accordance with the Corporate Governance Directive issued by the SIX Swiss Exchange.

4.2 Decentralised management

Datwyler operates a systematically decentralised management system within a clear framework. By taking decisions at the lowest possible level close to the market and customers, the Company fosters an entrepreneurial culture with a high level of identification and fast response times. Full transparency in the organisation ensures the necessary sense of responsibility in decision making. In the performance of their duties, all employees must abide by the Rules of Organisation, Delegation of Responsibilities and any special instructions issued by the employer.

4.3 Responsibility and supervision

All supervisors or managers are responsible for the employees reporting to them. They must earn their respect through exemplary personal conduct, performance, reliability and social skills. They set clear, ambitious and realistic goals, lead by trust and allow employees as much personal responsibility and freedom as possible. They, or the Human Resources Department, can also be consulted by employees if they have any job-related or personal concerns.

All supervisors or managers have organisational and supervisory duties to perform. They are responsible for ensuring that no violations of law are committed within their areas of responsibility that could have been prevented or impeded by proper supervision. They still remain accountable even if some tasks have been delegated.

The following applies in particular to management, responsibility and supervision:

1. The supervisor or manager must exercise care in selecting employees based on their personal and professional qualifications. The duty of care increases with the importance of the task to be performed by the employee (duty of selection).
2. The supervisor or manager must define the tasks in a precise, complete and binding manner, in particular with respect to compliance with legal requirements (duty of instruction).
3. The supervisor or manager must ensure that compliance with legal requirements is monitored continuously (duty of monitoring).
4. The supervisor or manager must clearly communicate to employees that violations of law are not acceptable and will have consequences under labour law.

In addition, all supervisors or managers are required to familiarise their employees with the Code of Conduct on a regular and documented basis.

4.4 Fair employment conditions

Datwyler companies around the world are committed to equal opportunities, equal treatment and fair employment conditions. They pay fair wages and salaries that cover employees' basic needs and provide decent living standards, and offer employee benefits in line with national and industry standards. In business reorganisation programmes, we consider the needs of the employees. Regular employee surveys provide the foundation for continuous improvements. Our employees are free to join trade unions. We maintain a constructive dialogue with internal employee representatives.

4.5 Systematic training and development

The markets in which Datwyler operates call for highly trained employees undergoing continuous development and improvement. Some of our initiatives to train young people are reflected in the numerous apprenticeships offered by Datwyler companies worldwide. We support training and retraining programmes to develop the technical and social skills of employees at all levels in the hierarchy. To promote management talent, Datwyler provides individual programmes tailored to future job skill requirements.

4.6 Occupational health and safety

Datwyler companies are committed to ensuring a safe and healthy working environment and provide employees with regular training. It is the responsibility of all individuals towards their fellow employees and colleagues to provide the best safeguard against hazards and accidents. This applies both to technical planning of workplaces, equipment and processes and to safety management and personal behaviour in everyday working life. All employees must pay constant attention to safety.

5. Dealings with business partners and third parties

5.1 Compliance with competition and antitrust laws

Fair competition is fundamental to free enterprise. The principle of integrity also applies to competition for market share. All employees are required to observe all rules of fair competition. In particular, employees must not enter into any discussions with competitors where arrangements are made about prices, capacities, industries, market territories or customers. Arrangements with competitors not to compete or to submit sham bids in a competitive bidding process are also prohibited.

Considering Datwyler's global presence, it is essential to pay attention to updates in corruption related laws in our different geographies. The company can be punished, independently of the culpability of an individual person.

5.2 No fraud and money laundering activities

All employees, when dealing with business partners and third parties, cannot accept nor engage, directly or indirectly, in any form of fraud or money laundering activities, as defined under 3.5 above.

5.3 No offering and granting of benefits

We compete for contracts on the merits of the quality and price of our innovative products and services. No employee may directly or indirectly offer or grant unwarranted benefits ("bribes", "kickbacks") to others in connection with their business activities, whether in cash or in the form of other services or benefits.

Business gifts to employees of business partners must be chosen so as to avoid any appearance of dishonesty and impropriety with the recipient, have a non-lavish value and be given on an irregular basis (e.g. promotional material or a box of chocolates). When it comes to officials¹, no gifts are allowed and any meals should have a non-lavish value, have a valid business purpose and be on an irregular basis.

We have zero tolerance for facilitating payments² at Datwyler, the same applies to third parties that interact with officials on behalf of Datwyler.

Employees who enter into contracts with consultants, intermediaries, agents or similar third parties must make sure that these parties do not offer nor grant any unwarranted benefits either.

¹ Examples of officials include, but are not limited to: a judge or legislator, employees working for a public international organization, officials at the national, state or local level, employees of a foreign government, employees of companies under government/state ownership or *de facto* control (even if the company is operated as a privately-owned corporation, employees of a government-owned or operated public university or institute, political parties, party officials or candidates running for political office, or members of a royal family.

² Facilitating payments are a particular form of bribery that may also be referred to as 'kickbacks', 'backhanders', or 'grease payments'. It is a payment for a routine governmental action (e.g. to obtain a permit, police protection or to have papers processed), typically a small amount, that happens infrequently and is paid for something you are entitled to, and to accelerate the process.

5.4 No solicitation and acceptance of benefits

No employees may use their position with the Company to solicit, accept, procure or be promised benefits ("bribes", "kickbacks"). This does not apply to the acceptance of occasional gifts of nominal value. Other gifts must be refused or returned.

5.5 Special contracting rules

Everyone bidding for a contract expects their tender to be given fair and impartial consideration. Employees involved in awarding contracts must in particular observe the following rules:

- All employees must inform their supervisors or managers of any personal interests they might have in connection with the performance of their duties for the Company. In particular, this also includes any family or personal relationships with a potential supplier. In such cases, competitive tenders must be obtained.
- Suppliers competing for contracts must not be unfairly favoured or discriminated against.
- Invitations from business partners may only be accepted if the occasion and the scope of the invitation are appropriate and if refusing the invitation would be discourteous. We exercise restraint in travel and functions involving overnight stays and, if an invitation is accepted, pay the costs of overnight accommodation and return travel ourselves. A process is in place for reporting invitations accepted that have a value equivalent to more than CHF 500.-/USD 500.-/EUR 500.-. Each company must implement this process in an appropriate manner.
- Gifts from business partners must be refused or returned unless they are occasional token gifts of nominal value.
- No employees may have private work carried out by firms with which they have business dealings if they could gain any advantage from the deal.

5.6 Sponsorship payments and donations

Datwyler companies may make donations in cash or in kind to education and science, arts, culture, sports and social causes. Datwyler does not provide financial support to political parties, organisations nor office holders. The following rules apply for granting donations:

- No payments to persons or organisations associated with a competitive bidding process for a business contract or order.
- Requests from individuals for donations should generally be refused.
- No payments to private accounts.
- A donation may never be granted to individuals or organisations that do not have an impeccable reputation or whose objectives are not consistent with those of Datwyler.
- The donation must be transparent. The recipient of the donation and its actual use by the recipient must be known. The donor must be able to account for the reason for the donation and its use for the intended purpose at any time.
- A process is in place for approval and reporting of sponsorship payments and donations totalling an amount in excess of CHF 500.-/EUR 500.-/USD 500.- per recipient and financial year. Each company must implement this process in an appropriate manner.

5.7 Separate Supplier Code of Conduct

We believe in the values and the standards this Code of Conduct sets out and look to ensure compliance with the above-mentioned standards and rules in our relationship with our suppliers. We are committed to our values and standards and we expect our suppliers to feel obliged to adhere to similar standards and rules. The specific requirements in this regard are regulated within Datwyler's Supplier Code of Conduct, which is applicable across the whole Datwyler Company. This document can be found on Datwyler's website.

6. Avoiding conflicts of interest

6.1 Policy of avoidance

It is important to the Company that its employees do not face any conflicts of interest or loyalty in their work. Such conflicts can occur when an employee works for or has a financial interest in another company. Conflicts of interest may also arise as a result of family or personal relationships. Therefore, the policy is to avoid conflicts of interest.

6.2 Non-competition

Employees are not permitted to run a business that competes fully or partially with Datwyler. In addition, they are not permitted to hold direct or indirect interests in a non-publicly listed company that competes fully or partially with Datwyler.

Prior written approval must be obtained before a financial interest is acquired in a company that is a business partner of Datwyler. Approval will be granted by the management and documented in the employee's personnel file. Approval will not be granted or may be withdrawn later if the employee has business dealings with the company concerned.

Financial interests held by close relatives in a competing company or any other company described above must be immediately disclosed to the supervisor or manager and the Human Resources Department in writing by the employee, in case of awareness of such. This will be documented in the employee's personnel record.

6.3 Outside activities

The supervisor or manager must be notified in writing before an employee takes up any paid outside employment or activities. The outside activities may be prohibited if they interfere with work performance, are inconsistent with the employee's duties in the Company or could give rise to a conflict of interest.

7. Use and protection of Company assets and information

7.1 Use of assets

The facilities and equipment in offices and workshops (e.g. telephones, photocopiers, PCs including software and the Internet/Intranet, machines, tools) may be used only for business purposes. Exceptions and, if necessary, any payment will be determined locally. It is never permissible to access or transmit material that incites racial hatred, violence or other criminal offences or that contains material perceived as sexually offensive in the particular cultural context.

Employees are not permitted, without the consent of their supervisor or manager, to create recordings, files, photo, video and audio documents or copies unless directly required to perform their job.

7.2 Records and reports

Open and effective cooperation requires accurate and honest reporting. This applies to the relationship with investors, employees, customers, business partners, the public and government offices alike. All records and reports produced internally or distributed externally must be accurate and truthful. In accordance with proper accounting practices, data recorded and other records must always be complete, accurate, timely and understandable. In particular, the principle of truthful presentation also applies to expense accounts.

7.3 Confidentiality: intellectual property and inside information

Internal Company affairs that have not been publicly disclosed must be kept confidential. Examples include trade secrets, intellectual property, internal reporting data and details relating to the Company's organisation and assets. The obligation to maintain confidentiality continues even after employment ends.

As Dätwyler Holding Inc. is a publicly listed company, all employees are required to comply with insider trading legislation. Trading in securities of Dätwyler Holding Inc. on the basis of privileged and confidential information is not permitted. Disclosing such information without authorisation or making a recommendation for the purchase or sale of securities of Dätwyler Holding Inc. is also prohibited. Employees involved in the preparation of the Annual and Interim Reports are prohibited from trading in securities of Dätwyler Holding Inc. during the binding closed periods specified.

7.4 Data privacy and security

Together with the advantages of modern electronic communications, there are also risks for privacy and security of confidential data. Taking effective measures to safeguard against these risks is an important part of IT management, management responsibility and also the conduct of each individual. The standards of conduct expected in the use of ICT resources are set out in a separate ICT Security Policy.

Personal data may only be collected, processed or used if needed for specified, explicit and legitimate purposes. A high standard of data quality and technical protection to prevent unauthorised access must be ensured. The use of data must be transparent for those concerned; their rights to information and correction and, if need be, to object and have data blocked and deleted must be preserved.

7.5 General Data Protection Regulation (GDPR)

Since the GDPR (General Data Protection Regulation) came into force in the EU, many other countries in Europe and abroad have adopted data protection laws to protect fundamental rights and meet the challenges of the digital economy. Datwyler believes in and supports the right to privacy and, therefore, has implemented the GDPR in Europe. All Datwyler companies and subsidiaries are responsible for adhering to and maintaining compliance with local data protection laws and ensuring the general data protection and security principles defined by the group.

Failure to comply with data protection principles may result in the imposition of severe penalties (e.g., breach of GDPR rules may result in penalties of up to 4% of a company's annual turnover)).

8. Environment and community

8.1 Environmental protection

Datwyler Group companies understand and live up to their responsibility to protect the environment, complying with all applicable legislation. Furthermore, we make every reasonable effort to minimise identifiable risks. Specifically, this means that when choosing resources, products and manufacturing processes, we are committed to finding the most environmentally friendly materials and techniques that will have the least possible impact on the environment, and potential impact on human rights, when the products are manufactured, used, re-used, recycled, or ultimately disposed of. All employees are required to conserve natural resources in their environment.

Based on the core ecological values, many Datwyler facilities have already obtained the ISO 14001 certificate. Other companies are working towards ISO environmental certification. As a Group, Datwyler provides sustainability reports in accordance with globally accepted guidelines.

8.2 Community involvement

Datwyler recognises its share of responsibility for general civic causes and maintains regular contact with local authorities. We support social initiatives, endeavour to help the disadvantaged within and on the fringes of society and allow our employees to participate appropriately in community service. Datwyler regularly runs local community engagement projects in the regions where its sites are located, in which Datwyler employees can volunteer for a good cause.

9. Reporting procedure, violations and disciplinary action

All employees are required to report circumstances that may constitute a violation of the Code of Conduct. These should be brought to the attention of their direct supervisor or manager, the general manager responsible, the Human Resources Department responsible or the Compliance Officer (currently the Group Chief Financial Officer). The first person contacted will investigate the matter thoroughly. If appropriate, suitable action will be taken. Employees and supervisors should use all internal means to resolve the matter at the lowest possible level. All documentation will be kept confidential. We will not tolerate retaliation of any kind. The reporting employee must not suffer any disadvantage as a result of submitting a complaint or report in good faith. However, deliberate abuse of the complaints system is a violation of the Code of Conduct by the employee and may result in disciplinary action.

In addition to the means described above, Datwyler provides a whistleblowing hotline offering two anonymous channels, free of charge worldwide, for reporting violations of the Code of Conduct:

- A) By email: whistleblowing@datwyler.com
- B) By telephone: +800 875 11 000 (or +18332883543 for calls from the USA, 00218003200019 for calls from Brazil, 0008003200019 for calls from India, 018001239587 for calls from Mexico, +18008751100 for calls from Singapore, 8000410237 for calls from the UAE)

All information provided will be investigated immediately and be treated confidentially in conformity with the applicable data privacy requirements.

Any employee who violates rules contained in the Code of Conduct can expect disciplinary action, up to and including dismissal, besides the penalties imposed by law.

10. Implementation and monitoring

Datwyler's organisational units and worldwide companies and subsidiaries actively facilitate wide communication of the Code of Conduct and ensure its sustained implementation. Every employee will receive a copy of the Code of Conduct. Supervisors, or managers, and the Human Resources Departments will give the Code of Conduct to all new employees together with their employment contract and are responsible for communicating its contents.

The internal auditors regularly monitor compliance with laws and observation of the Code of Conduct in all organisational units of the Datwyler Group.

The Board of Directors receives an annual report from the Executive Board concerning compliance with the Code of Conduct.

This Code of Conduct was adopted by the Board of Directors of Dätwyler Holding Inc. on 27 June 2008 and became effective on 1 July 2008. It was updated with effect from 1 January 2014, from 2 February 2018, and from 14 December 2023.

Disclaimer

This Code of Conduct does not create any rights enforceable by employees or third parties against Dätwyler Holding Inc. or any of its Group companies. The Code is subject to change.



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