

## Schaffner Integrity Code

Schaffner is committed to the highest standards of integrity, sustainability, and legal compliance. The integrity code is the framework that defines the behavior Schaffner expects of every employee and stakeholder around the world regarding social responsibility, environmental protection, business ethics, health and safety, legal and statutory regulation compliance, data and information security and intellectual property. It is based on Schaffner values for openness, ownership, leadership, customer focus and passion. We have a zero-tolerance policy when it comes to unethical business behavior or illegal practices by our employees as well as our business partners.

### Social Responsibility and Diversity

#### **Child labor and young workers**

Child labor is not to be used at any stage of manufacturing. The term “child” refers to any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is highest.

#### **Wages and benefits**

The compensation paid to employees complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, employees shall be compensated for overtime at pay rates greater than regular hourly rates. Working hours do not exceed the maximum set by local law.

#### **Modern slavery**

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is prohibited. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

#### **Freedom of association and collective bargaining**

In conformance with local law, we respect the right of all employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respecting the right of employees to refrain from such activities. Employees and/or their representatives can openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

#### **Harassment and non-discrimination**

We are committed to a workplace free of harassment and unlawful discrimination. In hiring and employment practices such as wages, promotions, rewards, and access to training, we do not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and its expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, protected genetic information or marital status.

#### **Diversity and inclusion**

We embrace diversity. The diversity of our employees is key to our success. Their wide-ranging skills, perspectives and experiences form the basis of innovation that enable us to better understand the needs of our customers around the world. Our corporate culture is characterized by respect, tolerance and team spirit.

## Environmental Protection

### **CO2 footprint, CO2 neutrality and the greenhouse effect**

We are monitoring and documenting our energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions at our facilities and/or at corporate level. Participants must look for cost-effective methods to improve energy efficiency and minimize their energy consumption and greenhouse gas emissions.

We are launching programs to reduce the greenhouse effect towards the global CO2 carbon neutral targets. And we expect the same from our stakeholders.

### **Pollution prevention and resource reduction**

We are minimizing emissions, the discharge of pollutants and waste generation both at source and with sound practices such as the deployment of pollution control equipment; modifying production, maintenance, and facility processes; or by other means.

Natural resources, such as water, fossil fuels, minerals, and virgin forest products, are to be conserved by practices such as modifying processes, materials substitution, re-use, conservation, recycling, or other means.

### **Hazardous substances**

Chemicals and other materials hazardous for humans, or the environment are identified, labelled, and managed to ensure safety during their handling, movement, storage, use, recycling or reuse and disposal.

### **Air emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustible by-products generated from operations are characterized, routinely monitored, controlled, and treated as required prior to discharge. We conduct routine monitoring of the performance of air emission control systems.

### **Product life cycle**

We are considering the entire Product Life Cycle from product and process design to manufacturing, logistics and end of product life when applying the principles stated above.

## Business Ethics

### **Disclosure of information**

All business operations are performed transparently and accurately compliant with participant's financial accounts and records. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

### **Anti-corruption, extortion and bribery, conflicts of interest**

A conflict of interest occurs when an individual's personal interests – family, friendships, financial, or social factors – could compromise his or her judgment, decisions, or actions in the workplace. We respect global thresholds and taking into consideration local standards across regions where we do business. We also recognize that other companies and customers often have their own code of conduct, and we are committed to never placing anyone in a position that violates their commitments. Our controlled and transparent approval process for gifts, entertainment and expenses means our employees can be confident in never crossing the line.

In order to determine whether gifts, entertainment or expenses are appropriate, each employee should consider the following criteria:

- A gift and entertainment must be given as an act of appreciation, friendship, or hospitality.
- Any gift, entertainment, or reimbursement of expenses to place the recipient under any obligation is not permitted.
- We do not accept any payment or reimbursement of expenses which is misused to hide inappropriate gifts or entertainment.
- The nature of the gift, entertainment or expense is appropriate and is in line with both general business practice as well as local cultural and ethical standards any other applicable laws.

### **Donations**

Donations may not be offered, promised, or given if they are intended to influence official action or secure an improper advantage either to individuals, commercial organizations, or organizations that do not have tax-exempt status and must be transparent and tax-deductible.

Payments to private accounts or in cash (in both directions) are not permitted.

Payments for routine actions are prohibited. Sometimes known as facilitating payments, these are small payments made to lower-level government or private sector employees as a personal benefit to them, in order to gain advantage or speed-up the performance of a routine action.

### **Contributions to political, religious, or ideological organizations**

The Schaffner Group is strictly neutral in matters of politics, religion, or ideologies. Therefore, no contributions are permitted that can be understood as supporting the cause of any such political parties, party officials, candidates, organizations, or individuals

### **Whistle blowing**

We maintain the confidentiality, anonymity and protection of supplier and employee whistleblowers unless prohibited by law. We have a communication process operated by personnel so that any concerns can be raised without fear of retaliation.

## Health & Safety

### **Occupational safety and health**

A safe and healthy work environment enhances the quality and consistency of products, services, and all associated processes, as well as contributing to higher morale and worker retention rates. We are committed to minimizing the incidence of work-related injury and illness, this includes:

- Processes where workers are potentially exposed to safety hazards (e.g., chemical, electrical, and other energy sources, fire, vehicles, and fall hazards) - These are identified, assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tagout) and ongoing safety training.
- Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks associated with these hazards.
- Worker exposure to hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks are to be identified, evaluated, and controlled.
- Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.
- Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.
- Reasonable steps are also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as providing reasonable facilities for nursing mothers.

### **Promoting health & safety**

We have procedures and systems in place to prevent, manage, track and report occupational injury and illness including provisions to encourage their reporting by employees. This includes classifying and recording injury and illness cases; providing necessary medical treatment; investigating cases and implementing corrective actions to eliminate causes; while finally helping employees back to work.

We provide employees with appropriate workplace health and safety information and training in the language of the employees or in a language the employees can understand for all identified workplace hazards they may be exposed to, including but not limited to mechanical, electrical, chemical, fire and physical hazard. Health and safety related information is clearly posted in the facility or placed in a location identifiable and accessible by employees. We provide training for all employees prior to starting work and regularly thereafter.

### **Participation and consultation**

Employees are encouraged to raise safety concerns. Employees have the possibility to participate and contribute to decision-making processes on occupational safety and health performance measures and ongoing improvements.

## Legal compliance and statutory regulatory compliance

### **Local law and regulation**

We monitor and track the applicability of laws and regulations to maintain compliance for every process owner.

### **Restricted Substance**

We adhere to all applicable laws, regulations and customer requirements regarding the prohibition or restriction of specific substances in products and during manufacture, including labeling for recycling and disposal.

### **Export controls and economic sanctions**

We respect global export regulations and sanctions as “dual use” etc.

### **Conflict Mineral**

We take every reasonable measure to assure that the tantalum, tin, tungsten, and gold used in products does not directly or indirectly finance or benefit armed groups who perpetrate serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. We exercise due diligence on the source and chain of custody of these minerals and take due diligence measures available to customers upon request.

## Data and information security

### **Protecting privacy and personal or sensitive information**

We are committed to take every reasonable measure to protect the privacy of personal information for all – our employees and everyone we do business with, including suppliers, customers, and consumers. We are compliant with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## Intellectual property

### **Intellectual property**

Intellectual property rights are respected; transfer of technology and know-how are carried out in a manner that protects intellectual property rights and ensures customer and supplier information is safeguarded.

## Reporting and communication channel

Employees are not only encouraged but required to speak up and report any suspected or observed violation of either the law, the Schaffner Code of Conduct, or if they are asked to do something that may be a violation. It must be directly reported to the next level superior and also to the business ethics committee. If a superior is involved in such a violation, it must be directly reported to the Schaffner whistleblower e-mail address:

[business.ethic@schaffner.com](mailto:business.ethic@schaffner.com)