



Code of Conduct

of the Güdel Group AG and its affiliated companies worldwide

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The Güdel Group AG and its affiliated companies which operate worldwide (hereinafter referred to as "Güdel") manufacture high-precision machine components and supply state-of-the-art automation solutions. Güdel is a typical Swiss family SME and looks back on a history of more than sixty years. The business operates globally and is a leading supplier of linear drive technology.

This Güdel Code of Conduct has been adopted by the Board of Directors and Senior Management of the Güdel Group AG. The rules set out in this Code of Conduct underpin all Güdel's business activities.

The Code of Conduct sets out guidelines on occupational safety, the environment, personal integrity, personnel policy, data security, communication, assets/finances of Güdel and facilitates comprehensive and organically growing compliance management in which Güdel engages actively.

The Code of Conduct applies to all Güdel employees worldwide. Details of the different compliance issues are set out in the relevant Güdel regulations. Güdel also requires its business partners to share and respect these values and principles.

The shared values described in this Code of Conduct are intended to facilitate the correct implementation of important laws, regulations and internal rules in our routine business. Action taken within Güdel should not only comply with the law and guidelines but must also satisfy ethical standards. Güdel is aware of its responsibility to employees, customers, suppliers, business partners and society at large.

Güdel tolerates no breaches of statutory provisions, this Code of Conduct or other regulations. Breaches will be sanctioned in accordance with the latest statutory and contractual provisions and internal compliance directives; the existing contractual relationship with the employee, customer, supplier or business partner concerned may be terminated as a result.

1. Principles and values

Alongside innovation, responsibility, open mindedness, effectiveness, sustainability and economy, Güdel requires compliance with the following principles and values:

1.1. Dealing with people and social responsibility

Güdel's strength on the market is attributable to the expertise and dedication of its employees and its ability to innovate. That is why Güdel provides good, safe and healthy working conditions for its employees.

Güdel recruits, employs and promotes employees solely on the basis of their qualifications and abilities (including reputation and reliability). Güdel encourages all individuals to develop their particular talents in various ways (including by further training opportunities, seminars). Discrimination of any kind will be investigated and punished. That applies in particular to human characteristics such as race, skin colour, ethnic origin, age and gender. In addition, Güdel respects the rights of children and condemns child labour and any form of slave labour. Güdel respects all laws and regulations on the minimum age for employment and the minimum working age and supports equal opportunities for women and men.

Güdel undertakes to respect internationally acknowledged human and employment rights. Güdel respects human and employment rights as set out in the United Nations Universal Declaration of Human Rights (UDHR), the eight fundamental Conventions drawn up by the International Labour Organisation (ILO) and the UN Guiding Principles on Business and Human Rights.

At Güdel, each and every individual has the right to work in a professional business environment which promotes equal employment opportunities and prohibits discriminatory practices. Güdel expects all inter-human relations at the workplace to respect high business standards, free from bias, prejudice and harassment.

Güdel employees and business partners who have access to the Güdel sites are prohibited from possessing and consuming drugs, narcotics, intoxicating beverages, firearms or other weapons at any Güdel site.

Employees protect the environment, assets of all kinds in its works, facilities, buildings and equipment.

1.2. Dealing with health, security, safety and environmental protection

Güdel undertakes to operate an environmentally-friendly and sustainable business and, whenever possible, to exclude substances and materials that may be harmful to human beings and nature from its manufacturing chain. The health and safety of employees, customers and the general public are guaranteed. In the performance of their activities, all employees are personally responsible for safety,

health and environmental protection at their workplace. All employees are required to constantly facilitate a better working environment.

Güdel runs its business responsibly and in compliance with the legal requirements and official regulations of every country in which the enterprise operates. Illegal actions are not tolerated. Güdel expects its suppliers and business partners to comply with all current laws and regulations.

1.3. Dealing with data security and electronic means of communications

Güdel takes the protection of confidentiality and data security seriously. Data of employees and business partners are handled with great care. For this purpose, Güdel appoints a data protection officer (DPO). In particular, Güdel ensures that personal data are processed solely for the specific legitimate purpose for which they were gathered and always in compliance with applicable laws and principles of Güdel; further, that only personal data needed for a specific defined purpose are gathered and that such data are only stored for the necessary length of time.

Güdel makes various means of electronic communication available to its employees or in certain individual cases participates in their procurement. This includes such devices as telephones, fax machines, computers, mobile phones and tablets. Such means of communication are intended as a matter of principle and priority to be used for the business activities of and for Güdel. These means of communication are to be used in compliance with Güdel criteria and with the necessary diligence. While complying with all regulations, including those of a local nature, Güdel employees may exceptionally use these devices for their personal purposes. By this is meant communication that is not directly related to Güdel's business activities.

1.4. Use of the social media

Güdel is aware of the benefits and risks of the social media (e.g. blogs, wikis, communities, social networking websites, Twitter, Instagram), but expects employees to use these platforms with a sense of responsibility and in a reasonable manner without causing prejudice to Güdel or reputational damage. Güdel employees are not allowed to appear on social media in Güdel's name. In addition, local guidelines relating to the use of social networks and media must be respected.

1.5. Prevention of corruption; free competition

Güdel ensures that gifts and hospitality are handled correctly. The company prevents bribery and corruption of any kind and complies with the criteria of competition law. Arrangements with competitors or business partners which seek to achieve or bring about unlawful restriction of competition are strictly prohibited and will be punished. No direct or indirect gifts may be made, or other advantages offered to public and private office holders and decision-makers which are in breach of the provisions of criminal law on bribery and corruption.

The presentation of small business gifts, donations and/or reasonable business hospitality to individuals must take place in consultation with the superior of the offering employee on the basis of local business practices and regulations. Gifts and invitations with a total value of up to CHF 200 per year in cooperation with the same business partner are permitted if they do not result in a conflict of interests. Employees must give details of all gifts received from customers, suppliers or other third parties to their immediate superior and may not retain such gifts without the consent of their superior. Güdel employees may never solicit gifts, donations, business hospitality or valuable preferential actions.

1.6. Prohibition of money laundering, correct accounting

Güdel complies with the relevant statutory obligations to prevent money laundering. Güdel respects the currently valid tax rules and does nothing to facilitate tax evasion by employees, customers, suppliers, business partners or third parties. The company assures accurate accounting based on recognised rules.

1.7. Confidentiality and protection of intellectual property

Intellectual property protection laws protect valuable assets of Güdel – our patents, trademarks, registration data, copyright, business secrets, domain names and other accompanying rights. Güdel respects the intellectual property rights of third parties and expects all employees to do so in their daily working lives. Güdel employees are required to protect Güdel's intellectual property rights and at the same time to respect those of third parties.

Employees who have access to confidential information, including e.g. confidential information about research and development projects, production processes, business plans, financial data, marketing and distribution strategies, market launches of new products and corporate mergers or acquisitions are required to treat such information in strict confidence.

1.8. No party-political activities

Güdel does not engage in party-political activities and makes no payments to political parties or to funds of groupings whose activities serve party-political interests. In business transactions with governments or (State) departments, Güdel must comply with and defend its lawful business objectives. Güdel may do so either directly or through the intermediary of organisations such as professional or economic associations. Within the limits of the law, employees are authorised to play an active part in trade unions or similar institutions.

1.9. Dealings with business partners

Güdel expects its business partners to comply with the applicable laws, branch directives, contractual conditions and generally acknowledged sustainability standards. This concerns in particular the protection of human rights, security and environmental protection, the prohibition of child labour and forced labour, money laundering and bribery. Güdel supports the acknowledged principles of the machine and equipment construction industry in favour of a responsible procurement system.

2. Speak-up culture

2.1. Maintaining an open dialogue

Güdel sets great store by a culture of mutual trust which encourages the free exchange of opinions between all levels of the company. An open-minded working environment plays a key role in our success. Employees can make a valuable contribution by maintaining an open dialogue and through active participation.

If employees have any doubts about conduct which seems contrary to the rules, they must inform their superior or the person designated for this purpose by the Executive Board without delay. All concerns expressed in this way shall be investigated by Güdel immediately and discreetly with the appropriate

degree of diligence and respect. The subject of such concerns may be misconduct in relation to laws, principles, regulations or values and principles set out in the code of conduct.

Güdel encourages employees to speak up in the cases referred to above. By doing so, the employee gives Güdel an opportunity to examine the matter and, if necessary, bring about improvements. Silence about potential misconduct may cause the situation to deteriorate and lessen trust. Reported incidents will be recorded and investigated by a standardised procedure. Güdel passes particularly difficult cases on to a neutral external body for further action. All the information provided, including the identity of its author, will be treated in confidence. Güdel tolerates no sanctions against employees who have spoken up.

3. Compliance Council

Güdel has set up a Compliance Council which, under the supervision of the Board of Directors and Executive Board of the Güdel Group AG, advocates a functioning compliance system within Güdel. The Compliance Council is made up of representatives of Güdel who have an influence on Güdel's business activity and also on the Board of Directors and Executive Board.

Wherever possible, a compliance officer will be appointed in each Güdel company (having regard to the size and structure of the business unit); that officer shall perform special tasks on behalf of the Compliance Council.

The Compliance Council has the following main aims:

- Employees know how Güdel manages compliance and whom they can contact if rules are infringed or unlawful action taken.
- The Compliance Council assures pragmatic networking with all responsible persons, foremost among them the local Compliance Officers and the management of other national companies.
- Ongoing provision of information about important compliance topics and continuing training and educational programmes on compliance issues globally.
- Regular audits in all the national companies with a view to detecting errors and bringing about improvements in the matter of compliance.
- Regular reporting on compliance activities to the Board of Directors and Executive Board of Güdel.

This Code of Conduct applies to all companies and employees of the Güdel Group worldwide. It is based on the *Regulation of the Güdel Group on Compliance* which sets out key points relating to the implementation and organisation of compliance.

Any failure to respect the compliance rules must be notified without delay to the Executive Board. Details of the principles and values will be found in the relevant Güdel Regulations, which are binding on all Güdel employees.

If you have any questions or suggestions, please contact Güdel using the following email address or telephone number at any time: compliance@ch.gudel.com or +41 62 919 96 40.

Adopted and entered into force in Langenthal on 16 September 2019