



WE ARE BAUMANN: FROM VALUES TO RESPONSIBILITY

CODE OF CONDUCT

CONTENT

Purpose and Scope 5

Ethical Compass 6

Regulatory Compliance 8

Ethical Business Practices 10

Corporate Citizenship 12

Information Protection 14

Value Chain / Supply Chain 16

FOREWORD CEO

Dear colleagues,

As a family-owned company with over 135 years of history, BAUMANN is aware of its responsibility towards its stakeholders, society and the environment. This document is more than just a set of guidelines—it embodies the values and principles that define who we are as an organization and how we conduct our business. It reflects our strong commitment to integrity, respect, and excellence. These core values are the foundation of our success and the reason we have earned the trust of our clients, partners, and the communities we serve. Each of us has a responsibility to uphold these standards in everything we do, ensuring that our actions reflect the highest ethical behavior. This code of conduct is designed to guide us in navigating the complex and dynamic business environment in which we operate. It outlines our expectations for ethical behavior and provides a framework for making decisions that align with our values. It also serves as a reminder that our actions impact not only our company's reputation but also the well-being of our colleagues and the broader community. I expect that you read this code of conduct carefully and to refer to it regularly. It is a living document that will evolve as our company grows and the world around us changes. Your adherence to these principles is essential to maintaining the integrity and success of our organization. Thank you for your commitment to upholding the highest standards of ethical conduct. Together, we will continue to build a company that we can all be proud of.

Sincerely,

Thomas H. Rüegg
CEO BAUMANN Group



PURPOSE AND SCOPE

PURPOSE

The purpose of this code of conduct is to provide clear guidance to all employees on expected behaviors and standards of conduct. It ensures that we conduct our business with integrity, respect, and in compliance with all applicable laws, regulations, and industry standards.

RESPONSIBILITY

All employees are responsible for familiarizing themselves with the code of conduct of BAUMANN and integrating its principles into their daily work. Furthermore, our leaders are held to the highest standards of ethical conduct. This means leading with integrity, transparency, and accountability, and fostering a culture of trust, respect, and open communication.

IMPLEMENTATION

Beyond the individual responsibility to follow the code of conduct, we provide regular training and communication to ensure that all employees understand and adhere to the principles outlined in BAUMANN's code of conduct. This includes conducting comprehensive orientation training for new employees, providing ongoing training and support, and communicating updates and changes to the code of conduct in a timely manner.

MISCONDUCT

Violations of the BAUMANN code of conduct will not be tolerated and may result in disciplinary action, up to and including termination of employment, and in the event of serious breach to a criminal investigation. Employees who observe or suspect a violation of the code of conduct are encouraged to report it immediately and confidentially via the internal SpeakUp!-process or directly via the SpeakUp® Line (see QR-code).



UPDATE

This code of conduct is reviewed and updated on a regular basis to ensure its relevance and effectiveness. Updates are communicated to all employees and stakeholders, and training is provided to ensure understanding and adherence to any changes.

LANGUAGE VERSIONS

The BAUMANN code of conduct is available in multiple languages to ensure accessibility and understanding among our diverse workforces. Employees are encouraged to refer to the version in their preferred language for clarity and comprehension.

HOW WE DECIDE ETHICALLY

ETHICAL COMPASS

The code of conduct of BAUMANN is not intended to cover all laws, rules, or ethical situations. We must use common sense and good judgment to determine the right course of action. It's unrealistic to know everything, **so if you're unsure about the ethical implications of a decision, use these simple questions as your moral compass:**

- Would this action be in line with the code of conduct?
- Would this action be ethically acceptable?
- Would I be acting fairly and honestly?
- Would this action be legal?
- Would this action be appropriate?
- Would this action reflect well on me and the company?
- Would I act the same way if a colleague or my supervisor were witnessing it?
- Would I be comfortable seeing this action reported in the news or online?

If the answer to any of these questions is "No," you should refrain from taking the action. If you need further guidance, please reach out to your manager, senior management, or the integrity office via integrity@baumann-group.com.

HOW WE RESPECT RULES

REGULATORY COMPLIANCE

Human rights: We respect and uphold the fundamental human rights of all individuals, both within our organization and in the communities where we operate. This commitment includes, but is not limited to, prohibiting:

- **Child labor:** We adhere to a strict prohibition on the employment of children. Employees must be 15 years of age or older (or above the age limit set by local law) and we will not allow minors to be exposed to dangerous or harmful work.
- **Human trafficking, slavery, and forced labor:** We do not employ forced or compulsory labor and ensure that all employees work voluntarily and have the freedom to terminate employment with notice. No employee shall be forced to work against his/her will under any form of coercion, threat or physical or psychological violence.

We actively promote and protect human rights through our business practices and partnerships, addressing any risks or violations that may arise.

Compliance with other norms, rules, and laws:

We are committed to complying with relevant laws, regulations, and industry standards in all aspects of our business. This includes labor laws, environmental regulations, product safety standards, employee health and safety standards and regulations and any other legal requirements applicable to our operations.

Minimum wages: We are committed to paying all employees fair and competitive wages that comply with applicable minimum wage laws and regulations. Any deviations from legal minimums are promptly rectified to ensure compliance and fairness.

Employee association and trade unions: We respect the right of free association of employees. We further commit to neither favor nor discriminate against members of employee organizations or trade unions.

EXAMPLE

Emma who works at the sales department notices that a customer is not fully compliant with local labor laws, particularly in regard to child labor. However, she is tempted to overlook this due to the customer's strategic importance.

✓ Emma must report this issue through the SpeakUp! process immediately. Ignoring such violations compromises the company's integrity and legal standing. Continuing to work with this customer could expose BAUMANN to serious risks. If Emma is unsure how to report, she should seek guidance from her manager. Emma must always prioritize the company's values over personal convenience.

HOW WE DO BUSINESS

ETHICAL BUSINESS PRACTICES

Respect and trust: We value respect and trust as foundational elements of our workplace culture. This means treating colleagues, clients, and partners with dignity, fairness, and professionalism at all times, fostering an environment where diverse perspectives are respected and valued.

Transparency and accurate reporting: We ensure that all financial and non-financial information we create or report, including our sustainability report, is true, fair, and complete. As a family business, we are committed to transparency and accuracy, reflecting our values of trust and integrity in every aspect of our reporting.

Product safety and quality: We are committed to delivering safe, high-quality products that meet or exceed customer expectations. This means maintaining quality control standards throughout the manufacturing process, conducting regular inspections and tests, and continuously improving product quality and safety based on customer feedback and industry best practices.

Sustainability: We are committed to incorporating sustainable solutions into our operations, aligned with Environmental, Social, and Governance (ESG) principles. We acknowledge the urgent need to address climate change and are committed to reducing our greenhouse gas emissions. We encourage our employees, partners, and stakeholders to join us in these efforts, fostering a culture of sustainability throughout our organization.

Corruption and conflicts of interest: We have zero tolerance for any form of corruption like bribery or money laundering. Employees are expected to conduct all business dealings with honesty, integrity, and transparency. They must avoid any situation that may compromise the company's reputation or integrity. This includes avoiding situations where personal interests may conflict with the interests of the company or its stakeholders.

Gifts and hospitality: We prohibit accepting expensive gifts or hospitality from stakeholders to avoid any perception of bribery or conflict of interest. Modest, customary gifts may be accepted if they are transparent and do not influence business decisions. Employees should report any significant offers and seek guidance when in doubt to ensure compliance with our ethical standards.

Antitrust and fair competition: We compete fairly and ethically in the marketplace, avoiding any actions that may unfairly restrain trade or hinder competition. This includes refraining from engaging in price-fixing, bid rigging, market allocation, or any other anti-competitive practices.

Donations and sponsoring: We believe in giving back to the communities where we live and work through charitable donations and sponsorships. Our donations are made in accordance with our corporate values and strategic priorities, with a focus on supporting causes related to education, sports events, and environmental conservation.

EXAMPLE

David, a purchasing specialist, receives an invitation to a lavish dinner from a supplier, along with a gift that feels extravagant. The timing is right before an important contract negotiation.

✓ David should politely decline the gift and invitation, as accepting expensive gifts could raise questions of favoritism or bribery. Even if it seems harmless, such actions can damage David's credibility and the company's reputation. David should report any significant offers to his supervisor for further guidance.

HOW WE TREAT STAKE- HOLDERS

CORPORATE CITIZENSHIP

Employees: We place employees at the core of our business, recognizing them as our most valuable asset. We are committed to providing opportunities for professional and personal development based on individual abilities, ensuring mutual growth for both our employees and the company.

Health and safety: We accept no compromises on the health and safety of our employees, customers, and communities. This means providing safe products, a safe working environment, following health & safety standards and regulations, conducting regular safety training and inspections, and promoting a culture of accident prevention.

Physical and mental integrity: We are committed to the physical and mental well-being of all employees. We maintain a zero-tolerance policy towards violence, harassment, mobbing, bullying and abuse, including any gestures, language, or physical contact that is sexual, coercive, threatening, abusive, or exploitative.

Equal opportunities: We promote equal rights, opportunities and fair treatment for all employees and stakeholders, regardless of skin color, race, nationality, social background, disability, sexual orientation, political or religious beliefs, gender, or age. We do not tolerate any form of discrimination and actively engage against it within our sphere of influence.

Whistleblower protection: We have a whistleblower policy in place to protect employees who report suspected violations of laws, regulations, or company policies in good faith. This includes ensuring confidentiality, non-retaliation, and appropriate investigation of reported concerns.

EXAMPLE

Sophia, a machine setter, overhears a colleague making a joke about another employee's accent during a team meeting. Some of her colleagues laugh, but others seem uncomfortable.

✓ Sophia should address this behavior directly or report it through the SpeakUp! process. Jokes or comments about someone's race, background, or appearance can be harmful and hurtful, even if not intended as such. The company expects all employees to treat each other with dignity and respect. Sophia can contribute to a more respectful work environment by speaking up or using the SpeakUp! process if necessary.

HOW WE TREAT ASSETS

INFORMATION PROTECTION

Physical property: We expect all employees to take diligent care of the company's physical assets, including buildings, equipment, and devices, to prevent misuse, damage, or loss. Diligent care of these resources is essential to maintaining a productive and secure work environment.

Patents and intellectual property: We respect the intellectual property rights of others and protect our own intellectual property. This means safeguarding proprietary information, respecting copyrights and trademarks, and seeking appropriate permissions when using third-party intellectual property.

Social media: We expect employees to use social media responsibly, ensuring that any reference to or mention of BAUMANN is professional and does not harm the company's reputation. Personal social media should be kept separate from business communications.

Data protection: We respect the privacy of our stakeholders' personal information and are committed to protecting it from unauthorized access, use, or disclosure. This includes implementing robust data privacy policies and practices in compliance with applicable privacy laws and regulations.

Data security: We take the security of our data seriously and expect all employees to safeguard confidential information and prevent unauthorized access or disclosure. This means following data security protocols, using secure communication channels, and reporting any security incidents or breaches to the Chief Information Security Officer (CISO) at ciso@baumann-group.com.

Information security: We prioritize the overall security of our information systems and networks, protecting against cyber threats, malware, and unauthorized access. This means implementing robust information security measures, such as encryption, access controls, and regular security audits.

EXAMPLE

Clara working in project management accidentally sends an email containing trade secrets to a customer.

✓ Clara should immediately notify her manager and the Chief Information Security Officer (CISO). The company takes data security seriously, and it's important for Clara to act quickly to minimize any potential damage. She should learn from the mistake and ensure that similar errors do not happen again by double-checking recipients before sending sensitive emails in the future. Clara should be proactive in following the company's data security policies to prevent future incidents.

WHAT WE EXPECT FROM OUR BUSINESS PARTNERS

VALUE CHAIN / SUPPLY CHAIN

Sustainable business practices: We prioritize ethical sourcing, environmental sustainability, and social responsibility. Our business partners are expected to adhere to the same high standards that we set for ourselves, with a focus on environmental stewardship, labor rights, and community engagement. This means we select and monitor (regular audits) business partners based not only on cost and quality but also on their commitment to fair labor practices, environmental stewardship, and ethical business conduct.

Conflict minerals: We aim to avoid the use of conflict minerals in our products and supply chain.

Security standards: We aim to safeguard sensitive information and maintain trust across our operations. Business partners must uphold robust security standards, implement technical and organizational measures to protect confidential data, prevent misuse, and ensure regular audits and staff training in data protection and cyber security. We expect our business partners to proactively inform us of security incidents within their systems, and to report such incidents directly to our Chief Information Security Officer (CISO) at ciso@baumann-group.com.

EXAMPLE

Ethan from the engineering department finds out that one of his suppliers uses materials that may be classified as conflict minerals, which goes against BAUMANN's commitment to ethical sourcing.

✓ Ethan should report the issue to his manager or the relevant department right away. Additionally, Ethan can make use of the SpeakUp! process if necessary. BAUMANN has a clear stance on responsible sourcing, and working with suppliers who do not meet these standards is unacceptable. If Ethan becomes aware of such practices, the best course of action is to raise the issue so it can be addressed, ensuring the company maintains ethical business practices.



CONTACT

BAUMANN Springs Ltd.
Fabrikstrasse 1
8734 Ermenswil
Switzerland

+41 55 286 81 11

info.ch@baumann-group.com