sateco°

Code of Conduct.

Sateco Group.

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INTRODUCTION

Since its founding in 1999, Sateco has made a name for itself as a pioneer with the introduction of silicone keypads in the automotive market and has consistently evolved since then. The Sateco brand represents quality, partnership, innovation, and internationality. As a Swiss family business, we employ over 800 employees at locations in Europe, the U.S., and Asia. Our clientele includes highly specialized system and component manufacturers from various industries worldwide, and we wish to continuously grow this position in the future.

As we set this plan in action, we intend for this code of conduct to serve as an ethical and legal compass for us and for our business contacts. Each of us does their part with their behavior on the culture in the company and between business contacts. This requires all of us to be familiar with and assume our responsibility. The term "Code of Conduct" stands for compliance with legal provisions, applicable rules and guidelines as well as adhering to and following additional ethical standards and requirements that have been established by society and the company.

The Code of Conduct is binding for all Sateco Group employees. It is also intended to be the basis for the behavior of all business contacts that exchange goods, materials, or services with Sateco. The Code of Conduct assists us in our pursuit of being a customer-oriented, reliable, and fair partner and employer for all parties involved.



Claudia Häusler
President of the Board of Directors



Dr. Daniel Häfliger
Chief Executive Officer

01

GENERAL REQUIREMENTS ON PERSONAL BEHAVIOR, LEGALITY AND INTEGRITY.

GENERAL REQUIREMENTS ON PERSONAL BEHAVIOR, LEGALITY, AND INTEGRITY

All employees must do the following

– Comply with the laws, provisions, internal guidelines and process descriptions, procedural and work instructions that apply in their areas of responsibility and the associated legal system.
– Respect and promote the reputation of Sateco and its business contacts.
– Avoid conflicts of interest between business and private matters.
– Refrain from providing oneself or others with illegal benefits.
– Comply with provisions related to occupational safety, environmental protection, and data protection.
– Immediately report infringements against the code of conduct to the respective, local General Manager.

Furthermore, each executive is obliged to do the following

– Comply with the behavioral guidelines for Sateco Group employees.
– Ensure that these rules are followed in their area of responsibility.

02

SOCIAL RESPONSIBILITY, EQUAL TREATMENT

Social responsibility is understood to be responsibility for society and the environment as such. In this respect, this results in the natural obligation to follow applicable laws, among other things. In its business decisions, Sateco is consequently obliged to obey the applicable legal system and act only within its boundaries. Specifically, we have developed the following principles.

2.1 HUMAN AND LABOR RIGHTS

We respect internationally recognized human rights as well as social standards. As such, we do not tolerate the following:
– Human rights violations including human trafficking
– Forced labor
– Child labor
These are not tolerated either in our own business operations nor in our supply chains.

We grant all our employees a fair wage and other benefits in compliance with applicable laws and provisions. Working hours and time off are defined according to applicable laws and provisions. We acknowledge the right of employees, trade unions, and employee representatives to establish collective agreements and local customs according to applicable laws, join them and actively participate in them.

2.2 EQUAL OPPORTUNITY AND EQUAL RIGHTS

We do not tolerate any discrimination based on ethnic origin, racial identity, culture, religion, age, disabilities, sexual identity or orientation, ideology, and gender. This applies not only but particularly for dealings with colleagues, employees, and business contacts as well as when hiring, promoting, or firing employees.

2.3 ENVIRONMENTAL PROTECTION

We strive to minimize and/or reuse or recycle waste during development, manufacturing, the usage phase, and the subsequent recycling of products as well as during other activities, and we strive to dispose of residual waste, chemicals, and wastewater according to applicable local laws. Furthermore, we and our business contacts with production locations maintain the appropriate environmental management systems such as according to ISO 14001 or are about to develop related ones.

We strive to prevent the risks, disadvantages and health and safety hazards for contracting people and end users and the entire environment to the best of our ability. Therefore, we and our business contacts comply with the applicable norms, legal and official provisions for their products, such as the REACH and RoHS guidelines as well as legal standards on product safety and labelling and packaging products.

2.4 OCCUPATIONAL SAFETY

We strive to meet national occupational, health, and fire safety laws. To that end, we provide the appropriate protective equipment and protective clothing as needed, install the appropriate fire protection equipment, label chemicals according to the globally harmonized classification and labelling system, and store them according to national guidelines. Inspections are carried out to preserve the protective measures for work-related health hazards.

Furthermore, we ensure that all employees are informed about the identified hazards and the applicable preventative and corrective measures for minimizing the hazards and have adequate qualifications for preventing work-related health disorders, preventing occupational accidents, for first aid, and for chemical management and fire protection.

03

CORPORATE RESPONSIBILITY

When it comes to corporate responsibility, integrity, transparency, and fairness are the main crucial factors that must be observed in Sateco employees' day-to-day business. Specifically, we have developed the following principles.

3.1 PROHIBITION ON BRIBERY AND CORRUPTION

It is forbidden to offer, promise, or grant domestic and foreign officials a personal benefit for executing or permitting an official act. Likewise, employees or representatives may not offer, promise, or grant personal benefits to domestic or foreign companies.

Along with the aforementioned prohibition, acts of bribery may not be performed with the help of others, such as family members, friends, intermediaries and advisors. Supporting the illegal actions of other people is prohibited.

As a general rule, employees are prohibited from requesting, accepting promises or outright accepting personal benefits either for themselves or for closely related people. Employees may accept personal benefits (e.g. invitations to restaurants or to sports events or gifts) only if it does not give the impression that something is expected of them in return. The benefit must be a common, general business practice and may not violate any laws.

3.2 PREVENTING CONFLICTS OF INTEREST

All employees must strictly separate their private interests and the interests of Sateco and its business contacts. The mere appearance of a conflict of interest must be avoided. The following are particularly prohibited

– Contracts to closely related people, e.g., with whom a familiar, friendly, and business relationship exists.
– Contracts to companies or consulting firms in which closely related people work.
– Contracts to companies or consulting firms in which closely related people have a shareholding of 5% or greater.
– Secondary employment for competing firms.
– Secondary employment for business contacts.

Exceptions may be approved only by the global management member in charge (CxO) and, in the final instance, the chairperson of the Administrative Board. Employees who wish to directly or indirectly obtain a shareholding of 5% or greater in a competing firm or already have such a shareholding must also report it to management. They will verify if there is a conflict of interest.

3.3 FIGHTING MONEY LAUNDERING

Sateco wishes to work only with reputable companies who act within the framework of legal provisions and refrain from using illegal financial resources. All employees must follow anti-money laundering laws and immediately report any suspected acts of money laundering to the respective, global manager member (CxO).

Sateco's business contacts should allocate and post incoming and outgoing payments directly to the respective, corresponding services. Furthermore, they must ensure that they are not infringing on any applicable legal provisions against money laundering or terrorism financing and will furthermore have business relationships only with companies (and subcontractors) that the partner companies believe to have integrity.

3.4 EXPORT CONTROL

Employees are aware that international commercial trade is subject to certain restrictions, approval requirements, prohibitions, or other monitoring measures by export control. In this respect, Sateco undertakes to comply with any applicable provisions for the import and export of its goods, services, and information as well as customs, foreign trade, and tax law.

3.5 BEHAVIOR TOWARDS COMPETITORS

Sateco's employees undertake to follow competition and anti-trust laws and to refrain from coordinating prices, quantities and terms with competitors and refrain from making any market segmentation agreements with competitors.

Most of the time, categorizations under competition and anti-trust law are complex and may lead to different results from country to country. In case of such uncertainty, all Sateco employes have the option of contacting management.

3.6 PROTECTING INTELLECTUAL PROPERTY AND DATA

Sateco is committed to respecting patent, operational and business secrets as well as know-how on a mutual basis and refraining from providing it to third parties without prior approval.

To protect privacy, there are special legal provisions, both nationally and internationally, for handling the personal data and information of employees, clients, delivery companies, and other parties involved. Sateco and their business contacts undertake to comply with the respective, applicable data protection laws. Moreover, personal data must be processed solely for a specific purpose and in accordance with the principles of data avoidance and data minimization as well as in compliance with legal provisions.

3.7 PROTECTING COMPANY ASSETS

In their area of responsibility, each executive must ensure that company assets or Sateco's operating equipment are protected from loss and abuse.

Company assets or operating equipment may not be used for private purposes nor for illegal activities without a separate regulation. The purchase and sale of company assets must be transparent, comprehensible, and profitable and take place under terms in line with market conditions. The personal interests of individual employees may not influence decisions on financial transactions.

Business contacts must also respect Sateco's material and immaterial assets and refrain from using them for non-business purposes. Furthermore, they must ensure that their employees who deal with Sateco's business assets or other operational resources handle them with care and neither damage nor use them in an abusive manner and particularly refrain from using them for private purposes or against Sateco's interests.

3.8 COLLABORATION WITH BUSINESS CONTACTS

Sateco expects its business contacts to:

– Comply with any applicable laws
– Prohibit corruption
– Respect human rights
– Comply with anti-child labor laws
– Comply with international commercial trade guidelines, particularly comply with export and import prohibitions as well as embargo provisions
– Protect the health and safety of all employees
– Comply with relevant national laws and international standards related to occupational safety, environmental protection, and data protection
– Carefully handle resources
– Comply with and implement these aspects in their own supply chains as well.

04

INFRINGEMENTS AGAINST THE CODE OF CONDUCT

4.1 CONSEQUENCES

Infringements may result in the following consequences for employees:
– Warning
– Termination
– Damage claims from third parties
– Fines
– Imprisonment

Infringements may result in the following consequences for Sateco:
– Damage claims from third parties
– Costly legal proceedings
– Fines
– Loss of contract
– Reputational damage

Infringements may result in the following consequences for business contacts:
– Extraordinary termination of the business relationship.
– Additional measures within the framework of applicable law.

4.2 RESPONSIBILITY

The respective General Manager is the person responsible for compliance with the code of conduct in every Sateco national company.

4.3 REPORTING INFRINGEMENTS

Sateco employees are obliged to immediately inform the company about infringements. This can also be done anonymously, if desired.

Suspected infringement should first be discussed with the supervisor or the specialist department in charge, e.g., human resources for work contract-related issues. If the supervisor or specialist department in charge cannot be reached for clarification or if there are still concerns, the next-higher level of management may be contacted. Business contacts should directly contact the General Manager of the respective Sateco country company.