



AXICOM HV AG
Industriestrasse 14
CH-5610 Wohlen
Tel +41 56 618 87 00

Code of Conduct for Suppliers - Corporate Social Responsibility Guideline -

We expect our business partners to conduct themselves according to standards comparable to those practiced by AXICOM HV AG.

This Code of Conduct lays out our expectations, with which you contractually agree to comply.

Compliance with laws and generally accepted standards

As a supplier of AXICOM HV AG, we will:

- comply with applicable laws and regulations, including any anti-corruption regulations
- act in accordance with generally accepted principles and standards regarding social and environmental responsibility and internationally recognized human rights, including existing laws to prevent modern slavery

Countering bribery and corruption

As a supplier of AXICOM HV AG, we will:

- not engage in any form of bribery or corruption and ensure that business decisions are not influenced by improper or illegal quid pro quo arrangements, including cash exchanges, gifts, travel or other items of value, including intangible benefits
- not offer any invitations, gifts or other objects of value with the intention of influencing AXICOM HV AG employees
- inform AXICOM HV AG about any demands or pressure to offer bribes (benefits of any kind), whether directly or indirectly, to public officials or other parties with the intention of exercising influence or obtaining an unfair advantage.

Accounts and records

As a supplier of AXICOM HV AG, we will:

- maintain full and complete accounts and records that accurately document all business transactions and expenses and are maintained in accordance with applicable laws and regulations

Conflicts of interest

As a supplier of AXICOM HV AG, we will:

- avoid situations in which our own interests are or could be in conflict with the business interests of AXICOM HV AG
- inform AXICOM HV AG immediately if we become aware of a conflict of interest; this applies also if an employee of AXICOM HV AG has a financial interest in our company or is in an economic relationship with our company in another way



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Protecting assets and information

As a supplier of AXICOM HV AG, we will:

- help protect AXICOM HV AG's assets from theft, misuse or waste
- take necessary measures to protect and keep confidential any of AXICOM HV AG's confidential data and information to which we have access

Antitrust law, economic and trade sanctions

As a supplier of AXICOM HV AG, we will:

- not pursue activities that can probably be construed as anti-competitive, abusive or unfair
- comply with all applicable antitrust and competition laws and regulations
- comply with laws and regulations governing the export and import of goods, products and services, including those relating to economic and trade sanctions

Employees

As a supplier of AXICOM HV AG, we will:

- provide safe work spaces that comply with international labor standards
- ensure fair working conditions and refrain from any form of unethical or illegal working conditions (e.g. harassment or physical violence, any form of slavery, forced or compulsory labor, including but not limited to child labor)
- not discriminate on the basis of origin, gender, sexual orientation, religion, ideology, disability or age
- ensure the right of association and collective bargaining and deliver written contracts of employment to employees in accordance with local legislation
- ensure that wages, working hours, holidays and absences of employees and commissioned external subcontractors are in accordance with applicable law and/or contracts
- comply with all applicable data protection laws

Environmental protection

As a supplier of AXICOM HV AG, we will:

- maintain the safety of our operations and minimize their environmental impact
- comply with applicable environmental laws and permits
- comply with applicable standards for the classification, packaging and labeling of hazardous substances and compounds, including the respective national implementation of the Globally Harmonized System (GHS) developed by the United Nations for the classification and labeling of chemicals.
- comply with the REACH Regulation of the European Union as amended, in particular with regard to Article 33, "Duty to communicate information on substances in articles."



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Society

As a supplier of AXICOM HV AG, we will:

- respect and strive to avoid and minimize any negative impact to society

Standards towards our own suppliers

As a supplier of AXICOM HV AG, we will:

- require our own suppliers and subcontractors to follow the principles set out in this Code of Conduct for Suppliers accordingly
- systematically integrate and follow up on this Code or appropriate procedures in our business relations with them

Material compliance and conflict minerals

As a supplier of AXICOM HV AG, we will:

- ensure that the goods and materials supplied to AXICOM HV AG have not been illegally or unethically sourced
- confirm the implementation of due diligence measures for the responsible sourcing of minerals to ensure compliance with the appropriate regulations
- inform AXICOM HV AG in the event of production, purchase or trading of controlled conflict minerals (tantalum, tin, tungsten, gold or other minerals or derivatives deemed to finance conflict) from the Democratic Republic of Congo (DRC) or its neighbors and, upon request of AXICOM HV AG, provide information on our due diligence measures and any associated results in order to exclude the possibility of supplying AXICOM HV AG with such minerals

By accepting an order from AXICOM HV AG, you undertake to adhere to the requirements of this Code of Conduct for Suppliers. If you are unable to provide corresponding documents on request to demonstrate your adherence with these requirements, you agree to establish a documentation process covering your compliance with these regulations.

AXICOM HV AG reserves the right, should any concerns arise, to request further self-regulation statements and certifications or to implement other appropriate measures in accordance with the contractual agreements.

In the event of suspected misconduct or if you yourself become aware of any inappropriate action on the part of AXICOM HV AG employees, please submit a report to AXICOM HV AG, Management, Contact see www.AXICOM-HV.com