

A top-down view of several hands of different skin tones stacked in a circle, symbolizing teamwork and unity. The background is a soft, blue-tinted image of the hands and forearms.

SHARED PRINCIPLES MOVING FORWARD TOGETHER

Code of Conduct – SpiraTec AG

TABLE OF CONTENTS

1 PURPOSE & SCOPE



2 PRINCIPLES OF CONDUCT



3 SOCIAL RESPONSIBILITY



4 CONSULTANTS & FREELANCERS



5 COMPLIANCE & REPORTING SYSTEM



6 RESPONSIBILITIES & FINAL PROVISIONS



1 PURPOSE & SCOPE



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Together in Principles

This Code of Conduct serves as a guideline for ethical and responsible behavior within the SpiraTec Group. It is intended to help all employees make decisions in their everyday working lives that are in line with our values, legal requirements, and social expectations.

The Code of Conduct applies to all employees and managers of the SpiraTec Group as well as all Partners who work on our behalf. It applies in all professional situations – at the workplace and during external appointments, business trips, and digital interactions. We also expect behavior that is consistent with our principles of conduct outside of working hours, especially when employees are publicly associated with the company.



1 PURPOSE & SCOPE

Our goal is to promote a respectful, safe, and inclusive work environment in which integrity, fairness, and transparency are practiced. The code helps to minimize risks, strengthen trust, and protect the Reputation of the SpiraTec Group.

For external business partners, especially suppliers, the principles of our Supplier Code of Conduct apply, which specifies expectations for ethical behavior, social responsibility, and sustainability in the supply chain. We expect our partners to be familiar with, respect, and actively implement this code.

Note: In this Code of Conduct, "SpiraTec Group" always refers to SpiraTec AG and all its affiliated companies.



2 PRINCIPLES OF CONDUCT



2 PRINCIPLES OF CONDUCT

Our corporate culture is based on shared values that guide our daily actions. These principles form the foundation for respectful cooperation, responsible decisions, and sustainable success.

2.1 Respect & Integrity

We treat our employees, customers, and partners with respect, openness, and appreciation.

Discrimination, bullying, or harassment based on ethnic origin, race, gender, religion or belief, age, or sexual orientation has no place in our company and will not be tolerated. We value diversity.

Working together for an inclusive corporate culture

SpiraTec Group stands for integrity, responsibility, transparency, and compliance with the law. Our Code of Conduct is the binding framework for legally and ethically correct behavior—for all employees, regardless of position, location, or entity within the SpiraTec Group.

This Code of Conduct is more than a set of rules – it is an expression of our attitude. Each and every one of us contributes to strengthening and maintaining trust in the SpiraTec Group.



2 PRINCIPLES OF CONDUCT

2.2 Responsible and fair business conduct

We comply with applicable laws, internal guidelines, and ethical standards. Every employee of the SpiraTec Group is responsible for complying with national and international laws and the established rules of conduct. Failure to comply with legal regulations and violations of the Code of Conduct can cause lasting damage to the reputation of the SpiraTec Group and have far-reaching consequences.

We avoid conflicts of interest and always act in the best interests of the SpiraTec Group.

Corruption, bribery, or unfair behavior will not be tolerated. Employees of the SpiraTec Group may not demand or request gifts, favors, or benefits from business partners. Accepting such gifts, favors, or Benefits is only permitted in accordance with the internal compliance guidelines. Requests from business Partners for gifts or personal advantages must not be complied with. We ensure that SpiraTec Group companies are not misused for money laundering or other illegal purposes. Cash transactions must be kept to a minimum.



2 PRINCIPLES OF CONDUCT

We are committed to fair and free competition.

We reject any business conduct that aims to gain an economic advantage. Even coordinated behavior or informal agreements are not tolerated by the SpiraTec Group.

The SpiraTec Group's annual financial statements reflect all economically relevant transactions.

Our corporate policy requires that all deposits and withdrawals be accurately recorded. We expect our employees to provide truthful and complete information about all transactions.



3 SOCIAL RESPONSIBILITY



3 SOCIAL RESPONSIBILITY

As the SpiraTec Group, we bear responsibility toward society and the environment. Sustainability and social commitment are an integral part of our actions.

3.1 Sustainability

We pay attention to ecological, social, and economic sustainability.

Our goal is to develop sustainable solutions that maximize customer benefits, minimize negative impacts on the environment, and make a positive contribution to society. We strictly reject child labor, forced labor, and inhumane working conditions.

We also expect our partners to act responsibly. Suppliers and service providers are bound by our Supplier Code of Conduct.

We take responsibility for the environmental, social, and economic impacts of our actions—today and with a view to future generations—by committing ourselves to consistently implementing our corporate environmental policy. We are committed to protecting the environment by using resources efficiently, reducing emissions, and avoiding waste.



3 SOCIAL RESPONSIBILITY

For us, social responsibility means creating fair working conditions, respecting human rights, and promoting diversity.

Each and every one of us contributes to sustainability in our everyday work – whether through the conscious use of resources, responsible decisions, or support for sustainable initiatives. Our goal is to combine economic success with social added value while acting in a transparent, responsible, and future-oriented manner.

3.2 Respectful working conditions

We promote an open culture of error and feedback. We respect the rights of our employees.

We communicate openly and transparently. We share information honestly and completely, as far as legally and organizationally possible. We respect our employees' right to organize freely and communicate openly with management about working conditions. Working hours comply with applicable legal requirements. We pay fair wages that correspond to the local legal minimum wage. We also require our business partners to meet these requirements. We treat others fairly and objectively. We promote equal opportunities and avoid any form of discrimination or favoritism.



3 SOCIAL RESPONSIBILITY

3.3 Occupational safety

The safety and health of our employees are our top priority.

We comply with all applicable occupational health and safety regulations and work together with our employees to ensure a healthy, safe, and hazard-free working environment. Everyone is responsible for avoiding hazards and complying with safety instructions. Potential risks or unsafe situations must be reported immediately. The use of drugs and alcohol during work is strictly prohibited.

3.4 Information security & data protection

The protection of sensitive data is a top priority.

We handle information responsibly – both internally and externally. All laws and internal guidelines on data protection, information security, and data integrity must be observed. In particular, data relating to our customers, suppliers, and employees must be protected against unauthorized use due to its highly sensitive nature. IT security is part of our daily work.



4 CONSULTANTS & FREELANCERS



4 CONSULTANTS & FREELANCERS

We take great care when selecting consultants and freelancers.

The commissioning of consultants and freelancers is sometimes necessary and advantageous for the SpiraTec Group. We reject the use of bogus self-employed persons.

We expect our partners to share our values and also require them to comply with the applicable standards via the Supplier Code of Conduct.



5 COMPLIANCE & REPORTING SYSTEM



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Violations of rules and laws should be reported internally to the direct supervisor. If this is not possible, a report can also be made directly to our external compliance officer.

Anonymous reporting is also possible. Every reported suspicion will be investigated. Compliance violations can be reported in writing to cm@spiratec.com.

Whistleblowers are protected — reprisals will not be tolerated. The primary goal is to protect the principles and standards of the SpiraTec Group.



6 RESPONSIBILITIES & FINAL PROVISIONS



6 RESPONSIBILITIES & FINAL PROVISIONS

Managers exemplify compliance with our principles of conduct and build trust.

Our corporate culture is based on responsible communication between supervisors and employees. A relationship of trust must be maintained between both levels. Supervisors ensure that employees are aware of and apply the applicable rules and laws. They serve as the first point of contact for questions.

Managers have a special role model function. They are responsible for exemplifying the code, sensitizing their teams, and providing support in clarifying questions or conflicts.



6 RESPONSIBILITIES & FINAL PROVISIONS

Compliance with this Code of Conduct is the responsibility of all employees. Each and every individual is responsible for implementing the values and rules contained therein in their everyday work and for actively seeking clarification in case of uncertainty. The Code is reviewed regularly and updated as necessary to ensure that it complies with current legal and social requirements. It can be viewed at any time on the intranet and on the website.

The Executive Board bears overall responsibility for the strategic anchoring of the Code of Conduct and ensures that the necessary resources are made available for its implementation.



A top-down view of several people's hands stacked together in a circle, symbolizing teamwork and unity. The hands are of various skin tones and are wearing different colored sleeves (white, grey, blue). The background is a light blue-grey color.

SHARED PRINCIPLES
MOVING FORWARD TOGETHER
