

# Code of conduct

## Preamble

By our actions we – all Furrer+Frey AG employees – influence the internal and external reputation and perception of our enterprise. This code of conduct is the foundation of our action and reflects our values: focus on customers and solutions, fairness, self-reliance, sense of responsibility for the environment and for society, trust in the competence of our employees.

Our action is expected to comply with statutory provisions and high ethical standards and is guided by respect for generally valid fundamental and human rights. Employees at every level of the Furrer+Frey AG hierarchy comply with the law, regulations and internal rules. We likewise expect our business partners to respect these principles.

If more stringent or different regulations apply to individual areas, they take priority over this code of conduct.

Breaches of statutory requirements, this code of conduct or other provisions may be punishable.

## Social conduct

- We treat one another respectfully, honestly and politely.
- Discrimination and harassment (of a sexual or personal nature), insults based on gender, religion, national or ethnic origin, sexual orientation, handicap, political opinion or social affiliation will not be tolerated.
- We encourage our employees' development and support them in their pursuit of training.
- We give our employees the benefit of modern working conditions: a fair salary, equal pay for men and women. At the same time, we endeavour to assure the best possible compatibility of family and work.

## Safety

- We attach the utmost importance to protection of the physical and mental health of our employees and that of third parties.
- We take preventive measures to protect our employees' safety, give them suitable training and equip them with the necessary safety kit.
- We comply with internal and statutory safety criteria and standards.

## Information and communication

- We are conscious of our duties of secrecy and treat all business information (financial data, technical data, correspondence, contracts, agreements, plans, strategic information) – both verbal and written – in confidence and with the necessary discretion.
- Our customers', suppliers' and business partners' data will likewise be treated appropriately by us.
- We protect Furrer+Frey AG's intellectual property such as inventions, research outcomes, product development, software etc. and do not disclose any information about them to third parties.

- If confidential information or intellectual property have to be disclosed in a cooperation with third parties, a secrecy agreement will be signed.
- We comply with the current requirements of data protection law.
- Communications with the press and via social media are effected by a central entity and comply with the relevant internal guideline. Contact is established for this purpose via [marketing@furrerfrey.ch](mailto:marketing@furrerfrey.ch).
- In our dealings with one another (internal communication and communication with third parties) we are appreciative, fair and non-judgmental.

### **Competition**

- We comply with the requirements of competition law and do not make any unfair agreements with competitors or business partners. We act on the principle of good faith.
- When participating in competition, we comply with the requirements of public procurement law.
- We avoid conflicts of interest in that private interests are treated separately from those of Furrer+Frey AG. Employees are required to disclose existing or potential conflicts of interest (e.g. orders placed with related persons [spouses, relatives, persons living in the same household, friends, private business partners]; orders placed with companies in which related persons work in positions that are relevant to decision-making or in which related persons hold participations).

### **Bribery and corruption**

- We do not tolerate any form of bribery (promising or accepting promises of advantages for the commission of [official] actions in breach of duties) or corruption (abuse of a position of power or authority for personal purposes). Holders of public or private office and decision-makers must not accept or be offered any gifts or benefits whose purpose is to secure an unlawful advantage.
- We only offer gifts of an amount that is normal for the business relationship and on a materially reasonable scale (e.g. lunch, promotional gifts). The recipient must not be able to perceive any related obligations that might influence his business decisions.
- We likewise only accept gifts from our business partners that are habitual for the business relationship and are on a materially reasonable scale (e.g. lunch, promotional gifts). Gifts with a product value in excess of CHF 100.00 must be reported to [compliance@furrerfrey.ch](mailto:compliance@furrerfrey.ch). They will be shown on a list. Promotional gifts are an exception to this rule. Gifts in the form of cash (apart from customary gratuities) shall not be accepted. When business transactions are completed, no commissions or other rewards may be accepted.
- Furrer+Frey AG does not make donations to individuals or organisations whose goals are incompatible with our corporate philosophy or prejudicial to our reputation. Donations are always made transparently and care is taken to ensure that no conflicts of interest arise in this connection. Furrer+Frey AG makes no financial contributions to political parties.
- Facilitation payments must be avoided. In cases where there is a legal entitlement to services and these cannot be secured otherwise then by making facilitation payments, the management must decide on them.
- In case of uncertainty about gifts, suspicion of bribery or other matters relating to corruption, the Compliance Department must be contacted at [compliance@furrerfrey.ch](mailto:compliance@furrerfrey.ch).

### **Assets**

- We handle real property, furniture, tools, machines and all other assets of Furrer+Frey AG with due care and protect them against damage.
- Tools and supplies provided by us shall be used solely for business or other authorized purposes.

### **Environment and sustainable procurement**

- We – Furrer+Frey AG and its employees – comply with the applicable environmental legislation and standards. We expect our suppliers to do likewise.

- In relation to suppliers and products, we look for the most ecologically sustainable, socially responsible and economically viable solutions.
- We are aware that natural resources cannot be used on an unlimited scale and must be treated with proper care.
- When purchasing products, attention must be paid not just to the cost-benefit ratio but also to the most economical possible use of resources and energy and to the avoidance/reduction of emissions and waste.
- We set great store by a long-term relationship of partnership with our suppliers.
- In our daily work, we seek to assure the economical use of resources, sorting and avoidance of waste.
- Employees are encouraged to travel to work by public transport or cycle.

### **Reporting misconduct**

- Employees are required to report breaches of this code of conduct, of other internal guidelines or of statutory provisions to their immediate superior or to the Compliance Department ([compliance@furrerfrey.ch](mailto:compliance@furrerfrey.ch)).
- Incoming reports are treated in confidence and investigated carefully. Employees who report proven or suspected breaches of the guidelines do not have to fear negative consequences, provided that their own action is not (in part) responsible for the breach and the report was made with honest intent.

### **Penalties**

- Breaches of this code of conduct, other internal guidelines or statutory provisions may have consequences under labour law including reprimands, termination of employment and claims for compensation.
- If statutory provisions are breached, the possibility of taking legal action will be examined.

### **Contact**

Questions about this code of conduct or general matters of compliance are accepted and dealt with at [compliance@furrerfrey.ch](mailto:compliance@furrerfrey.ch).

Bern, 01 September 2021

The Management

### **Furrer+Frey AG**

Thunstrasse 35

3000 Bern 6

+41 31 357 61 11

[www.furrerfrey.ch](http://www.furrerfrey.ch)

[compliance@furrerfrey.ch](mailto:compliance@furrerfrey.ch)