

Code of Conduct

Preamble

As employees of Furrer+Frey AG, our actions have an impact on the reputation of our company and on how it is perceived both internally and externally. This Code of Conduct is the basis for our actions, and reflects our values. We are conscious and highly appreciative of the invaluable contribution made by our employees to the company's success.

Our actions meet legal requirements and conform to high moral standards, and are guided by respect for universally valid basic and human rights. Employees at all hierarchical levels of Furrer+Frey AG comply with laws, regulations and internal rules. This compliance is also expected of our business partners.

If stricter or different regulations apply to specific areas, these take precedence over this Code of Conduct. This Code of Conduct is also based on the recommendations of the amfori BSCI (Business Social Compliance Initiative), which aims to promote sustainable supply chains in European and international trade.

I. Scope

This Code of Conduct applies to all members of the Board of Directors and all employees of Furrer+Frey AG. The management of Furrer+Frey AG also expects all contractual partners (suppliers, consultants, agents, principals) to comply with this Code of Conduct in the performance of their contractual duties.

II. Compliance culture

A. A culture of openness and sincerity

As employees we are all co-entrepreneurs and enjoy the trust and authority this entails. Our values are shaped by identification, loyalty and exemplary commitment. Our actions are customer- and solution-oriented, fair and independent, as well as demonstrating responsibility towards the environment and society. We show appreciation and fairness in our dealings with each other, and take a non-judgemental approach. We support decisions that are applied to the company as a whole, and actively strive to contribute ideas, improvements, energy and team spirit. We take responsibility for our actions, take the consequences into account and are prepared to admit mistakes. We learn from our mistakes, and are motivated to keep on developing. Cooperation is our top priority, and we maintain open communication at all times and formulate convincing arguments in a professional manner. We address the concerns of our colleagues and ensure that necessary organisational changes are made.

B. Compliance with the law and regulations

We demonstrate a conscientious approach in all our actions, and comply with the law, internal regulations, standards and directives in all situations.

C. Personal responsibility

As employees, we strive to ensure that we are familiar with the latest legal provisions and internal directives that are relevant to our professional activities. Supervisors support their employees with the necessary information, instruction and training. If stricter or different regulations apply to specific areas, these take precedence over this Code of Conduct.

III. Treatment of employees

A. Health

Protecting the physical and mental health of our employees and third parties is our top priority.

B. Protection and safety

We take preventive measures to ensure the safety of our employees, and provide them with the necessary training and safety equipment. We comply with the appropriate legislation for the protection of health and safety at work and take effective measures to prevent accidents, injuries or illness among employees.

C. Occupational health and safety regulations

As employees we comply with internal and legal requirements, especially with regard to labour law and safety standards. We ensure that employees work reasonable hours within the framework of legal requirements, and that overtime is only worked where absolutely necessary.

D. Discrimination and harassment

Discrimination and harassment (of a sexual or personal nature), insults based on gender, religious affiliation, national or ethnic origin, sexual orientation, disability, political opinion or social affiliation are not tolerated. We treat each other with honesty and respect, and are appreciative and fair in our dealings with each other (both internal communication and communication with third parties).

E. Employee development

We support the development of our employees in terms of career management (e.g. junior project manager, project manager, overall project manager) and training.

F. Salary

We offer our employees modern working conditions – fair and equal wages for all, structured according to responsibility and subject area. At the same time, we make every effort to facilitate a healthy work-life balance for our employees.

G. Child labour

We do not employ children below the minimum legal age, either directly or indirectly, and protect children from any form of exploitation. Our business partners and suppliers are expected to do the same.

H. Special protection for young workers

We ensure that young people perform only as much night work as legally permissible and are protected from working conditions that are detrimental to their health, safety, morale and development.

We immediately remove all workers from dangerous work or sources of danger if such are identified. Furthermore, we ensure that a) the nature of the work cannot impair the health or development of young workers and b) working hours allow for school attendance, training or education programmes.

IV. Relationships with business partners and third parties

A. Compliance with antitrust legislation

In terms of quality, service and price, we compete fairly with other market participants in compliance with applicable competition and antitrust laws.

B. Assignment of work and awarding of contracts

Suppliers are selected on a competitive basis that incorporates comparison of the price, quality, performance, suitability and sustainability of the products and services offered. Emphasis is placed on ecologically appropriate, socially acceptable and economically effective solutions, and suppliers are regularly reviewed and assessed on the basis of their sustainability.

C. Procurement

When it comes to competition, we comply with the legal requirements of public procurement law (Federal Act and Ordinance on Public Procurement, etc.). We treat all providers and suppliers equally and ensure a fair and transparent process when awarding contracts and procuring services and goods, and observe the principles of non-discrimination, transparency and equal treatment. In addition to value for money, we also focus on ensuring to the lowest possible consumption of resources and energy, and on avoiding and reducing emissions and waste.

D. Fair competition

We comply with the requirements of competition law and do not enter into any prohibited agreements with competitors or business partners (e.g. on prices and/or markets). We act in accordance with the principle of good faith. Our communication is based on facts and presented in a fair and appropriate manner, with no false information being communicated about us or our competitors at any time.

E. Bribery, corruption and the granting and acceptance of advantages

We do not tolerate bribery (promising or allowing oneself to be promised benefits for performing actions that are contrary to one's duties) or corruption (abuse of a position of power or for personal purposes). No gifts may be made or benefits offered to public or private functionaries and decision-makers with the purpose of obtaining an unlawful advantage. We only offer gifts that are customary for the business relationship and remain within a materially reasonable scope (e.g. lunches, promotional gifts). Recipients must not be able to associate with these gifts any obligations that would influence their business decisions. Likewise, we only accept gifts from our business partners that are customary for the business relationship and remain within a materially reasonable scope.

Any such gifts must be minor in nature and socially acceptable, received no more than twice a year per person and business partner and with a maximum value of CHF 200 in each case. Gifts worth more than CHF 200 must be reported to compliance@furrerfrey.ch and are recorded in a list. Promotional gifts are exempt from this requirement. Gifts in the form of money must not be accepted, and commissions and other rewards must not be accepted when concluding transactions.

The payment of facilitation payments is not permitted. If there is a legal entitlement to benefits and they cannot be obtained in any way other than through acceleration payments, management shall decide on a case-by-case basis.

F. Conflicts of interest

We avoid conflicts of interest by keeping private interests and the interests of Furrer+Frey AG separate. Employees are required to disclose existing or potential conflicts of interest (e.g. assignment of work to related persons [spouse, relatives, persons in the same household, friends, private business partners], assignment of work to companies in which related persons work in decision-making positions or in which related persons have an interest). If we find ourselves in an actual or potential conflict of interest, we are obliged to disclose the situation immediately to our supervisor and the Compliance department (compliance@furrerfrey.ch). This also applies even if there only appears to be a conflict of interest.

G. Money laundering

No money laundering of any kind is tolerated at Furrer+Frey AG. In particular, this includes preventing the clarification of the origin, the tracing or confiscation of assets knowingly derived from a crime or tax offence. As employees of Furrer+Frey AG, we strive to be aware of any irregularities in payment transactions, especially in connection with large sums of cash and otherwise unusual transactions. Any irregularities can be reported to Compliance (compliance@furrerfrey.ch).

H. Donations and sponsorship

Furrer+Frey AG does not donate to individuals or organisations whose goals conflict with our corporate philosophy or damage our reputation. Donations are always made in a transparent manner, with care being taken to avoid any possible conflicts of interest. Furrer+Frey AG does not make donations to political parties.

I. Procedure

In the event of any uncertainty in terms of antitrust law, procurement, fair competition, in connection with gifts, suspected acts of bribery, conflicts of interest, suspected money laundering or questions related to donations and sponsorship, contact the Compliance department of Furrer+Frey AG at compliance@furrerfrey.ch.

V. Relationships with society and authorities

A. Local involvement

As Furrer+Frey AG, we maintain active contact with local contacts and promote local involvement.

B. Public offices and participation in governing bodies

As employees, we strive to ensure at all times that mandates we hold outside Furrer+Frey AG do not conflict with the interests of the company.

C. Cooperation with the authorities

As employees and managers of Furrer+Frey AG, we cooperate fully with lawful investigations conducted internally or by the authorities. The statutory right to remain silent and other procedural rights shall remain unaffected.

VI. Forced labour and/or human trafficking

We do not tolerate any form of slavery, forced labour, indentured servitude, human trafficking or forced labour, including state-imposed forced labour.

We follow international principles of responsible recruitment, including the “employer pays” principle, and require the same of recruitment partners who directly or indirectly hire employees, especially members of vulnerable groups.

This includes the following minimum principles:

- Employees are not charged recruitment fees and costs;
- Clear and transparent employment contracts;
- Freedom of employees from deception and coercion;
- Freedom of movement and no retention of identity documents;
- Access to free, comprehensive and accurate information;
- Freedom to terminate the contract, change employer and return safely;
- Access to free dispute resolution and effective remedies.

VII. Handling of data and information

A. Data protection

As employees of Furrer+Frey AG, we comply with the data protection regulations in force, and data relating to employees, business partners and third parties are handled with due care. All data, including those relating to our customers, suppliers and business partners, are processed only in compliance with the legal provisions and internal directives.

Personal data may only be collected, processed and used insofar as this is necessary for clearly defined and lawful purposes. The use of data must be transparent for the data subjects concerned. We respect their right to information, rectification and, if applicable, to objection, restriction and erasure. Personal data should only be accessible to those who need access in order to perform their duties.

B. IT security

Our business activities involve the need for effective technology in order to manage information. In terms of the confidentiality, integrity and availability of the IT system in operation, we comply with the requirements of the internal company directive on the permissible handling of IT hardware and software, as well as the Internet and e-mail services.

C. IT usage

We do not make private use – especially for abusive or illegal purposes – of information technologies and telecommunications intended for the performance of professional activities, i.e. company devices, software and systems and business software installed on our private devices.

D. Careful handling of e-mail communications

We take special care when formulating e-mails. We are conscious of the fact that electronic messages are permanent and may be modified or forwarded without our permission.

E. Intellectual property

We protect intellectual property of Furrer+Frey AG such as inventions, research results, product development, software, etc. and do not disclose any related information to third parties. Should disclosure of confidential information or intellectual property become necessary in a collaboration with third parties, a non-disclosure agreement will be signed.

F. Corporate communications

Communication with the press and via social media channels is carried out by a central unit and complies with the relevant internal policies. Contact is made via the Marketing department (marketing@furrerfrey.ch).

G. Social media

When using social media, we are conscious of the fact that private and public communication about the company and its products has an impact on Furrer+Frey AG. We are aware that personal and business activities can overlap, and act accordingly.

H. Confidentiality

As employees of Furrer+Frey AG, we are aware of our confidentiality obligations and treat all company information (financial data, technical data, correspondence, contracts, agreements, plans, strategic information) – whether oral or written – confidentially and with the necessary discretion.

VIII. Handling of assets

A. Handling of the assets of Furrer+Frey AG

We handle real estate, furniture, work equipment, machinery and all other assets belonging to Furrer+Frey AG with care, and protect them from damage. Work equipment and resources are provided exclusively for business use or other approved purposes. Abuse or intentional damage will not be tolerated.

B. Handling of third-party assets

We treat assets belonging to third parties with respect, and also comply with the legal requirements for the use of third-party intellectual property.

C. Fiduciary duties

We fulfil our fiduciary duties in a conscientious manner as required by law. This includes, in particular, bookkeeping, preparing financial statements, cash flow statements and VAT statements, liquidity planning, payroll accounting and personnel administration, as well as dunning and collection.

IX. Environmental protection

A. Legislation

As employees we comply with applicable environmental legislation and standards, and our business partners and suppliers are expected to do the same.

B. Environmental awareness

As employees of Furrer+Frey AG, we are aware of the limited availability of natural resources and the importance of conserving these resources. Considerate consumption of natural resources and the use of renewable raw materials and recyclable products wherever possible and meaningful is standard practice for the employees of Furrer+Frey AG.

C. Products

When it comes to suppliers and products, we focus on solutions that are as ecologically and economically sound and as socially acceptable as possible. When purchasing products, in addition to value for money we also focus on ensuring the lowest possible consumption of resources and energy, and on avoiding and reducing emissions and waste. Wherever possible, we prioritise regional suppliers and products and strive to maintain long-term partnerships with our suppliers, insofar as this is permitted by legal regulations (Federal Act and Ordinance on Public Procurement, etc.).

D. Furniture, office supplies and promotional gifts

When sourcing furniture, office supplies and promotional gifts, we look for high-quality, reusable materials from regional manufacturers that have a long service life and, if possible, can be returned to the circular economy or at least do not harm the environment.

E. Hardware

When sourcing hardware, we take care to purchase hardware that is durable, of high quality, repairable, and energy-saving and, if possible, bears a label that guarantees ecologically and socially responsible manufacturing or can be returned to the circular economy, or at least does not harm the environment.

F. Machinery and vehicles

When sourcing machinery and vehicles, we take care to purchase durable, high-quality and repairable products that are as environmentally friendly as possible and, wherever appropriate, have an electric or hybrid drive. We avoid purchasing machinery and vehicles with combustion engines whenever possible.

G. Waste

As employees, we take care to make sparing use of resources, avoid waste and ensure the sorting of any waste that is generated.

H. Commuting

We encourage our employees to travel to work by public transport or bike.

X. Reporting procedure, violations and punishment

A. Reporting of violations

As employees, we are encouraged to report violations of this Code of Conduct, other internal policies or legal requirements to our immediate supervisor or to the Compliance department (compliance@furrerfrey.ch).

All reports received are treated in confidence and thoroughly investigated. Employees who report verifiable or suspected policy violations must not be made to fear any consequences of their actions, provided they are not (jointly) responsible for the violation concerned, and the report is being made with honest intent. Reports that are clearly unfounded must be avoided.

B. Punishment of violations

Violations of this Code of Conduct, other internal policies or legal regulations may lead to consequences under employment law such as reprimands, dismissals and claims for damages. Contracts may also be terminated as a result. In the event of violations of legal requirements, criminal consequences may also be considered.

Bern, January 2023