
Code of Conduct

Commitment of SUTER INDUSTRIES

1 Our Mission

- cl. 1* SUTER is a company which is engaged in development, design and manufacture mainly of engines, powertrains, motorcycles and components for high-end applications.
- cl. 2* In addition, SUTER provides customized design and engineering for its customer.
- cl. 3* Through our vision & capability we aim to enrich our customers with extraordinary solutions.
- cl. 4* Our passion is always finding the best ratio in power density.
- cl. 5* The following principles guide our company and employees:

2 Business Ethics

- cl. 6* SUTER respects and complies with the laws, rules and regulations of the countries in which we are doing business in accordance with strict business ethics. We do not engage in any conduct that impedes fair and open market competition.
- cl. 7* As a worldwide active supplier of high-end developments and products, we adhere to applicable export control regulations.
- cl. 8* The company strictly prohibits all forms of child labor, in accordance with Swiss law and international conventions (e.g., ILO). Young workers (aged 15 to 18) may only be employed in light, safe tasks that do not harm their health or interfere with their education. Proper supervision and training are mandatory.
- cl. 9* All employees must receive fair compensation, at least equal to the legal minimum wage, along with benefits in compliance with Swiss regulations. The company ensures transparency in payroll and provides additional benefits to support employee well-being.
- cl. 10* Working hours must not exceed the limits set by Swiss law. Overtime must be voluntary, fairly compensated, and must not compromise the physical or mental health of employees. Work-life balance is actively promoted.
- cl. 11* All forms of modern slavery, including forced labor, debt bondage, and human trafficking, are strictly prohibited. The company conducts regular audits across its supply chain to prevent and address such practices.
- cl. 12* All recruitment practices must be transparent, voluntary, and merit-based. Retaining personal documents or charging recruitment fees to workers is strictly forbidden. Employment contracts must be clear and understandable.
- cl. 13* The company recognizes and respects the right of workers to form or join trade unions and to engage in collective bargaining. Retaliation against individuals exercising these rights will not be tolerated.
- cl. 14* The company promotes gender equality, equal access to opportunities, and protection against all forms of gender-based discrimination or violence. Policies supporting maternity, and parenting are encouraged.

- cl. 15* Discrimination based on gender, ethnicity, religion, age, disability, sexual orientation, or any other personal characteristic is strictly prohibited. The company enforces a zero-tolerance policy on harassment, with clear procedures for reporting and addressing incidents.
- cl. 16* The company values diversity as a strength and fosters an inclusive work environment where everyone is respected and has equal opportunities for growth. Training and awareness initiatives are actively promoted.
- cl. 17* The company is committed to respecting the cultural, social, and economic rights of minorities and indigenous peoples, avoiding any form of discrimination or exclusion in decision-making and business activities.
- cl. 18* The company does not participate in or support forced evictions or the unlawful acquisition of land, forests, or water resources. Any project impacting local communities must be preceded by free, prior, and informed consultations.
- cl. 19* The use of security forces must adhere to principles of legality, proportionality, and respect for human rights. Security personnel must be trained to act ethically and non-violently.
- cl. 20* We only make business decisions in the best interest of SUTER. We anticipate and avoid situations where our business decisions might be affected by personal relationships, benefits to family members, our own financial interests, voluntary work, secondary employment, political interests, or other private interests. We assess ourselves whether we can avoid or resolve a conflict of interest. If we cannot avoid or resolve it, we disclose the conflict before it affects our business decisions. As employees, we can disclose a conflict to our superior and the HR department.

3 Internal policy health and safety

- cl. 21* The management of Personal Protective Equipment (PPE) is essential to ensure workers' safety. We are committed to identify the appropriate PPE for each role. We carefully select the equipment, inform personnel on its correct use, and ensure regular maintenance. PPE is replaced when necessary. We also handle the proper disposal of worn-out or single-use equipment when it needs to be replaced.
- cl. 22* Machine safety is a fundamental element of occupational health and safety. We are committed to identifying and mitigating risks associated with the use of machinery through regular assessments, the adoption of appropriate safeguards, and the implementation of safety devices. All equipment is properly maintained according to guidelines, and workers are trained to operate it safely and to respond appropriately in the event of a malfunction. We also ensure that emergency stop systems are always functional and easily accessible, and that all safety procedures are documented and regularly updated.
- cl. 23* Emergency preparedness is fundamental for us. We are committed to identifying potential emergency scenarios through risk assessments and to developing effective and timely response plans. All personnel are trained to recognize critical situations and act in a coordinated manner, following clear and well-established procedures. We ensure the presence and accessibility of emergency equipment, such as fire extinguishers, emergency exits, and first aid kits, and we organize regular drills to test the effectiveness of our plans. All protocols are regularly updated to ensure a prompt and appropriate response when needed.
- cl. 24* Incident and accident management is a key aspect of ensuring a safe work environment and promoting a culture of prevention. We are committed to analyzing every event, to identify root causes and prevent similar situations from recurring. Employees are trained to report any event without delay and to actively contribute to the continuous improvement process. The data collected is used to update risk assessments and strengthen existing safety measures.
- cl. 25* Fire protection is a critical component of workplace safety. We are committed to minimizing fire risks through regular fire risk assessments, the installation and

maintenance of fire detection and suppression systems, and the availability of clearly marked fire extinguishers and emergency exits. All employees receive training on fire prevention, the correct use of firefighting equipment, and evacuation procedures.

- cl. 26* A Health and Safety Management System is essential for creating a safe, healthy, and compliant work environment. We are committed to implementing a structured approach to managing health and safety risks through clear policies, defined responsibilities, and continuous improvement processes. The system includes regular risk assessments, incident reporting and investigation, employee training, and performance monitoring. Compliance with applicable laws and standards is ensured, and all procedures are reviewed and updated regularly. This proactive approach helps prevent accidents, promotes employee well-being, and supports a strong safety culture across the organization.

4 Internal Environmental Policy

- cl. 27* Energy efficiency is important to us. The company continuously invests in energy-saving technologies, optimizes production processes, and promotes energy-conscious behavior among employees to reduce overall consumption. The company supports the transition to renewable energy sources.
- cl. 28* The company prioritizes low-carbon technologies, electrification, and sustainable logistics to reduce its carbon footprint.
- cl. 29* Water is consumed responsibly to minimize consumption and prevent pollution. The company implements water-saving initiatives across all facilities. The company takes proactive measures to reduce air pollutants such as particulate matter, NOx, and SOx. Emission control systems are installed where necessary.
- cl. 30* All chemicals used in operations are handled, stored, and disposed of in accordance with Swiss regulations and international best practices. The company maintains a chemical inventory and provides training to ensure safe handling. The company promotes the sustainable use of raw materials and natural resources.
- cl. 31* Waste generation is minimized through process optimization, lean manufacturing, and digitalization.
- cl. 32* The company implements systems for the reuse and recycling of materials wherever possible. Employees are trained to separate waste correctly, and partnerships with certified recycling providers are maintained.
- cl. 33* The company avoids activities that contribute to deforestation or habitat destruction. Environmental impact assessments are conducted before land development, and biodiversity conservation is integrated into project planning.
- cl. 34* Soil health is protected through responsible land use, prevention of contamination, and remediation of degraded areas. The company avoids the use of harmful substances that could degrade soil quality.
- cl. 35* Noise pollution is minimized using soundproofing technologies, equipment maintenance, and operational scheduling. The company ensures compliance with local noise regulations and considers community well-being.

5 Quality Management, Health and Safety

- cl. 36* SUTER holds the ISO9001 certification and complies with other applicable regulations. Thus, we maintain a process-oriented quality management system and systematically reviews in order to measure progress and achieve continuous improvements. We conduct our operations in accordance with all applicable environment, health and safety laws and regulations. We design and equip our products for safe

operation and operator intervention to prevent events that could have an adverse impact on people, property, and the environment.

6 Anti-Corruption and Bribery

- cl. 37* SUTER does not tolerate bribery or corruption or other corrupt behavior and is committed to complying with all relevant national and international anti-corruption laws (e.g. Foreign Corrupt Practices Act) when providing services. In connection with the provision of services, SUTER shall not offer, promise or grant, directly or indirectly, any unlawful payments, benefits, gifts or other pecuniary advantages to public officials or other private or public decision-makers or other business partners, or otherwise unlawfully influence their decision-making.

7 Conflicts of Interest

- cl. 38* We only make business decisions in the best interest of SUTER. We anticipate and avoid situations where our business decisions might be affected by personal relationships, benefits to family members, our own financial interests, voluntary work, secondary employment, political interests, or other private interests. We assess ourselves whether we can avoid or resolve a conflict of interest. If we cannot avoid or resolve it, we disclose the conflict before it affects our business decisions. As employees, we can disclose a conflict to our superior and the HR department.

8 Free and Fair Competition

- cl. 39* SUTER complies with all applicable competition laws and are committed to support fair, free, undistorted, and effective competition. We are committed to a well-functioning competition which is fundamental for growth and employment and ensures innovation and best prices in the interest of all market players and the final consumer.
- cl. 40* SUTER does not participate in illegal exchanges of competitively sensitive information. We do not participate in cartels (price fixing, allocation of markets or customers, etc.) and do not engage in an abuse of market power.
- cl. 41* We remove and distance ourselves from conduct that violates competition laws.

9 Compliance with Provisions of Foreign Trade Law

- cl. 42* SUTER ensures compliance with the relevant national and international foreign trade legislation and customs regulations, such as the applicable laws on the import and export of goods, services, technologies, software and information, as well as embargoes and other sanctions.
- cl. 43* We undertake to comply with the relevant requirements of national and international customs and foreign trade law that are necessary for compliance with the relevant customs and foreign trade law on importation (for example, official permits to be obtained or existing reporting obligations).

10 Data Protection and Privacy

- cl. 44* We ensure the proper use and protection of personal data and privacy and thus subordinate ourselves to the applicable data protection directives. We collect and process personal data carefully and responsibly and only for legitimate purposes. We protect personal data against loss, modification, and unauthorized use. We respect everyone's privacy.

- cl. 45 In case of doubt about the proper collection and processing of data, we ask the Data Protection Department for advice. We immediately inform our Data Protection Department in case of any data breach involving personal data.

11 Release & Change Log

Index	Change	Issuer	Approval	Release
V00	First Issue to be checked by MB & SM	13.03.24, LJ	16.04.24, ID-GL 50.11	16.04.24, LJ
V01	Updated issue	26.02.26, AGi MB	26.02.26, MB	26.02.26, AGi