

**CODE OF CONDUCT
FOR BUSINESS PARTNERS
OF THE SCHWIHAG-GROUP**

Dear Clients and Suppliers of the SCHWIHAG-GROUP,

The railway industry stands for values worldwide: sustainability, access to mobility regardless of social status, origin and personal wealth, efficiency and, even after more than 100 years, for progress and technology.

Innovation, quality, independence, customer orientation and sustainability are values that have led SCHWIHAG-GROUP to be the company it is today: one of the world's leading developers, producers and purveyors of track- and switch technology.

On the basis of these values, we are constantly optimizing the functionality, safety and quality of our products and further expand our market position.

The Executive Board of SCHWIHAG-GROUP is and has always been aware of its social responsibility. We are convinced that a value-oriented corporate management is an essential prerequisite for long-term economic success. Integrity, fairness, and sense of responsibility for each activity and above all compliance with the applicable laws are among of these values.

This includes in particular, but not only, sustainability, the observance of human rights in every conceivable form, compliance with all applicable antitrust rules, applicable anti-corruption laws, competition regulations, environmental laws and data privacy laws.

Compliance with these rules is expected not only of ourselves and our employees but also of our partners. This includes the obligation to align our collective actions with consistent value standards and to ensure compliance with these standards through appropriate organizational measures.

In this spirit we are making this code of conduct part of all our contracts.

Tägerwilen, Sep 20th, 2023



Karl-H. Schwiede
Chairman of the Board of Directors

Author signed.: R. Kuss	Auditor signed.: H. Vesterling	Approver signed.: K. H.Schwiede	Storage: BABTEC	SH-GF-DO-1020
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The SCHWIHAG Group is committed to the values that the railway industry embodies worldwide. We do not see compliance with laws and regulations, our internal rules and ethical guidelines as an obstacle to our economic success, but as an indispensable prerequisite. We know that we are in line with our suppliers and business partners. We therefore undertake, together with our business partners, to comply with the following rules when concluding every contract.

1. ETHICS, INTEGRITY AND LEGALITY

- **TO COMPLY WITH LAWS AND REGULATIONS**

We comply with all relevant laws and regulations that apply to us in any way. We behave fairly and ethically

- **TO PREVENT CORRUPTION**

We do not offer, promise or grant in connection with business activities direct or indirect unjustified benefits regardless of its form to public officials or persons of the private sector. In the case of business catering or other adequate social services corresponding to usual business practices and manners we take care to ensure that those never have a reference to a specific business transaction and when viewed in a strict manner should exclude business or administrative decisions to be made by it. These requirements apply strictly when dealing with public officers.

In case of doubt it should be refrained from catering or providing such care to public officials, politicians or other representatives of public institutions. These principles also apply for intermediaries, agents or consultants operating for us.

Of course, we observe these principles under the aspect of fighting against corruption and in order to avoid conflicts of interest towards SCHWIHAG-GROUP, also in regard to the acceptance of such business caterings or similar services.

- **TO OBSERVE THE RULES OF FAIR COMPETITION**

Fair competition for market share is a prerequisite for the success of our products. We follow the rules of fair competition. We do not make agreements about prices or price components, quota restrictions, distribution methods, the allocation of sales and reference markets, submission of sham bids, waivers of competition, nor are we trying to influence the resale prices of our customers or exerting anti-trust influence upon the competition.

- **TO NOT ALLOW ANY MONEY LAUNDERING**

We prevent money laundering by maintaining business relations only with reputable customers, vendors and consultants that subscribe to the same fundamental values and commit to compliance and whose funds are of legal origins. We comply with all laws to combat money laundering.

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- **TO OBSERVE THE ADDITIONAL PRINCIPLES OF THE UN GLOBAL COMPACT AND ILO**

We are committed to supporting and respecting the protection of international human rights and ensuring that we are not complicit in human rights violations and that we comply with the principles set out in the "ILO Declaration on Fundamental Principles and Rights at Work"., i.e. to protect freedom of association and the effective recognition of the right to collective bargaining, to work for the elimination of all forms of forced labor and for the abolition of child labor as well as for the elimination of discrimination in employment and occupation and for a safe and ensure a healthy working environment. The supplier ensures that concerns about child labor in its supply chain can be reported, investigates specific indications of child labor, takes appropriate measures to prevent or reduce negative effects, evaluates the results of the measures and communicates these results.

2. SUSTAINABILITY AND ENVIRONMENTAL COMPATIBILITY

The railway is one of the most climate-friendly, environmentally friendly and efficient means of transport in the world. It can make an important contribution to mobility in times of climate crisis. Since its founding, the SCHWIHAG-GROUP has made important contributions to improving the railway's environmental balance, for example through the introduction of lubrication-free switches and the use of material and resource-saving production processes. In the future, together with our partners, we will continue to contribute to ensuring that the railway remains the most environmentally friendly and sustainable means of transport.

- **WE PRODUCE IN AN ENVIRONMENTALLY AND RESOURCE-FRIENDLY WAY**

In particular, we produce in an energy-saving manner and with the greatest possible avoidance of CO₂, avoid water consumption and do not impair water quality, avoid waste, practice responsible chemical management and follow the precautionary principle when dealing with environmental problems.

- **WE DEVELOP SUSTAINABLE PRODUCTS**

When developing products, the environmental friendliness and sustainability of the product and its production are among the development goals. We accelerate the use of environmentally friendly technologies wherever possible.

- **WE AVOID PROCESSING AND SUPPLYING OF CONFLICT MINERALS**

We avoid the procurement, processing and delivery of gold and ores and concentrates that contain tin, tantalum or tungsten and that come from conflict areas within the meaning of the Swiss Ordinance on Due Diligence and Transparency Regarding Minerals and Metals from Conflict Areas and Child Labor (VSoTr) of the Swiss Federal Council. Our partners document the processing and delivery of metals that contain or consist of these substances, including in the form of by-products. They will refrain from purchasing these materials from conflict and high-risk areas and will provide documentation of their origin to the SCHWIHAG Group upon request.

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3. DATA PROTECTION

We undertake to comply with all applicable legal data protection regulations and to monitor compliance with them.

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