

# **Code** of Conduct for Business partners



# **TABLE OF CONTENTS**

1. Preamble	3
2. Compliance with the law	3
3. Human rights and working conditions	3
4. Occupational health and safety	3
5. Environmental and climate protection	4
6. Responsible raw material procurement	4
7. Material bans	4
8. Prohibition of corruption	5
9. Conflicts	5
10. Fair market behaviour	5
11. Handling of information	5
12. Implementation in the supply chain	5
13. Messages and notes	5
14. Contact	6

#### 1. Preamble

Studer Cables AG combines successful business with responsible action in order to shape the future of the company sustainably. In a globalized world with increasingly complex framework conditions, this is becoming more and more challenging. That is why it is important for Studer Cables AG that its suppliers and business partners also commit themselves to ecological and social responsibility.

The basic requirements for a responsible business relationship basing on integrity between Studer Cables AG and all business partners are laid down in this Code of Conduct "Studer Cables AG Code of Conduct for Business Partners".

# 2. Compliance with the law

Studer Cables AG expects its business partners to comply with all laws and regulations applicable to them in the context of the business relationship with Studer Cables.

## 3. Human rights and working conditions

Studer Cables AG does not tolerate any human rights violations. The business partners undertake to comply with national and international regulations for the protection of human rights.

Child labour is prohibited. Business partners are required not to allow the employment of children in their own company or with suppliers and business partners at any stage.

Forced labour and all forms of modern slavery and human trafficking are inadmissible.

Studer Cables AG expects its business partners not to tolerate any form of discrimination or harassment.

In accordance with the applicable national laws and regulations, adequate remuneration and working hours must be observed, as well as the freedom of association and the right to form interest groups to represent common interests and goals must be respected.

The business partners must always comply with at least the applicable laws.

## 4. Occupational health and safety

The business partners confirm that at least all applicable legal requirements for occupational safety and health protection have been properly implemented.

In addition, the business partners confirm the implementation of occupational health and safety in accordance with internationally recognized standards, such as the standards of ISO 45001.

This includes the determination of hazard and stress potentials combined with adequate protective measures. In addition, the business partners follow the principle of continuous improvement in the areas of occupational health and safety.

# 5. Environmental and climate protection

Studer Cables AG expects its business partners to provide adequate environmental management with the identification of all environmental aspects contained in their area of responsibility. In addition, the reduction of the environmental impact in the own production process through preventive measures according to the principle of continuous improvement as well as the consideration of environmental aspects in the supply chain and raw material procurement is expected.

The business partners undertake to implement all legal environmental protection requirements as well as the internationally recognized standards of operational environmental protection as intended, such as ISO 14001.

Business partners are expected to carry out activities aimed at reducing their environmental impact, in particular – but not limited to:

- the reduction of greenhouse gas emissions generated in their own operations as well as in their entire value chain
- the collection, calculation and evaluation of relevant greenhouse gas data according to international standards as well as the provision of data on demand
- increasing energy efficiency and the use of renewable energies
- · improving air quality and emissions
- supporting waste reductionincluding through reuse and recycling, as well as the provision of sustainable materials
- · the avoidance of noise emissions
- · the prevention of harmful soil changes
- the responsible handling of chemicals used in plants and products.

## 6. Responsible raw material procurement

The trade and extraction of certain raw materials, such as tin, tungsten, tantalum, gold and cobalt, are increasingly associated with human rights violations and environmental damage.

The business partners undertake to comply with their due diligence obligations with regard to relevant raw materials and to comply with all applicable regulations on conflict minerals, for example according to § 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act or Regulation (EU) 2017/821.

Studer Cables AG expects its business partners to provide the necessary information along the entire supply chain by using the appropriate templates.

#### 7. Material bans

Business partners must comply with all applicable laws and regulations regarding the restriction, registration and, if necessary, the authorisation or notification of hazardous or chemical substances contained in the final product or production process, provided that they apply to the relevant market, such as REACH, RoHS and TSCA.

# 8. Prohibition of corruption

Studer Cables AG is committed to fighting all forms of corruption and therefore expects its business partners to comply with all anti-corruption laws and not to tolerate corrupt acts in business transactions.

#### 9. Conflicts

Studer Cables AG and its business partners ensure that their employees make business decisions exclusively on the basis of appropriate considerations. Studer Cables AG expects its business partners to ensure that employees or third parties who are subject to a conflict of interest are not involved in corresponding business decisions. The business partners shall endeavour to avoid even the appearance of extraneous considerations.

### 10. Fair market behaviour

The business partners undertake to respect fair competition and to comply with competition and antitrust laws. Agreements with competitors and other actions that hinder the free market are prohibited.

# 11. Handling of information

The exchange and handling of sensitive information is an integral part of any cooperation with business partners. Studer Cables AG expects special care and the application of appropriate technical and organizational measures to protect the information. In particular, confidential and personal information must be protected in such a way that no unauthorized third party gains access and is only processed as intended.

## 12. Implementation in the supply chain

Studer Cables AG expects its business partners to comply with the principles of this document and to pass them on to the suppliers and business partners of their supply chain, to oblige them accordingly and to ensure compliance with these principles as well as to agree to a possible verification of compliance with these principles.

The supply chain basically refers to all products and services of a company and thus to all steps at home and abroad that are necessary for the manufacture of the products and the provision of services.

## 13. Messages and notes

Studer Cables AG endeavours to prevent any form of unlawful or even criminal activity within its own sphere of influence. Studer Cables AG expects its employees and its business partners to report information about possible misconduct via the following e-mail address: compliance@studercables.com immediately.

# 14. Contact

#### **Studer Cables AG**

Herrenmattstrasse 20 4658 Däniken/Switzerland Phone: +41 62 288 82 82

Email: compliance@studercables.com

www.studercables.com