

 <small>MECHANICAL AIR KATE INSTRUMENTS</small>	Code of Conduct	RL 1110488
		Revision 0.01

Code of Conduct

Sathom Sarl
4437 Waldenburg

Valid from
01. Januar 2021

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Foreword

Dear Employees, Customer and Partner

The SATHOM SARL Code of Conduct serves as an orientation framework for our daily actions. It describes the values SATHOM shares and how we want to work together. The aim is to make all employees aware of legal requirements, as well as to oblige them to comply with SATHOM's principles and ethical regulations. The guidelines apply equally to each of us - to the management, to the executives and to each individual employee. Further directives and guidelines can be specified according to the area of activity and must be known, understood and applied.

Together, we have a responsibility for the prestige of the company. Misconduct by a single person can cause enormous damage to everyone. Only responsible, legally compliant and ethically impeccable behavior on the part of each individual employee will help us to be perceived as a reliable and trustworthy company.

Respectful and cooperative collaboration as well as the conscious perception of social responsibility form the basis for our long-term corporate success.

The Code of Conduct does not regulate all conceivable situations and circumstances, which does not mean that unethical behavior is permitted. If in doubt about one's own conduct or if there are indications of legally dubious procedures, the direct supervisor or Head of HR should be consulted under the assurance of strict confidentiality.

Kind regards



Michael Arnac
CEO

Waldenburg, 2021

1. Preservation of confidentiality

Our products and know-how ensure the long-term success of the company. All employees are required to maintain appropriate and necessary security standards to protect company and trade secrets, both in personal dealings and in electronic communications with third parties.

2.1 Confidentiality

The confidentiality agreement is an integral part of the employment contract and is intended to ensure that internal company information, and in particular confidential information of SATHOM SARL, is not disclosed to third parties. Within the scope of employment, employees are given access to information and data that may not be made public. The obligation to maintain confidentiality continues after the end of the employment relationship.

2.2 Data protection

Customer data must be handled carefully and discreetly. The processing and transfer of data within or outside SATHOM SARL is only permitted in the context of the completion of business cases and in compliance with legal requirements and internal directives.

2.3 IT-Use

When using electronic information and communication sources, ethical behavior must be observed in addition to compliance with legal requirements such as data protection, copyright and trademark law. Statements intentionally damaging to business or reputation, threats or insults, false statements of fact or statements endangering industrial peace will not be tolerated by SATHOM SARL and will result in consequences under labor law.

3. Conduct in the business environment

3.1 Conduct with customers and the public

We maintain sustainable relationships with our business partners (customers, suppliers) characterized by honesty in our dealings, courtesy in our dealings, respect, fairness, mutual reliability and sustainability. This includes that decisions are

are made and communicated in a transparent and comprehensible manner.

In return, we expect our business partners to ensure that the principles set out in the Code of Conduct form the basis for cooperation and are observed by the

business partners also comply with the following principles in their area of organization and supply chain

principles are also observed:

3.1.1 Import

Business partners must ensure that their business practices comply with all applicable laws, instructions and regulations governing the import of parts, components and technical data.

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3.1.2 Export

Business Partners shall ensure that their business practices comply with all applicable laws, instructions and regulations governing the export of parts, components and technical data. Business Partners agree to provide truthful and accurate information and to obtain any export licenses or permits that may be required.

3.1.3 Responsible sourcing of mineral raw materials.

Business partners must comply with the laws and regulations applicable to minerals from conflict areas.

regulations applicable to minerals from conflict areas. These minerals include tin, tungsten, tantalum and gold. In addition, business partners must implement a policy to ensure that any tin, tungsten, tantalum and gold that may be included in the products they manufacture does not contribute, directly or indirectly, to the financing and support of armed groups that commit serious human rights abuses. Business partners must, by virtue of any applicable law, exercise due diligence with respect to the sourcing and supply chain of these minerals and, at a minimum, must require their suppliers to do the same.

3.1.4 Counterfeit Components

Suppliers are expected to develop, implement and maintain effective methods and processes appropriate to their products to avoid the risk of counterfeit components and materials being introduced into their products to be supplied. In addition, the suppliers undertake to inform the recipients of the counterfeit components in justified cases and to exclude these components from the delivery item.

3.2 Conflicts of interest

Employees shall avoid situations in which personal interests conflict with the fulfillment of their duties within the company. Paid secondary employment or employment affecting the company (e.g. political office, teaching, mandates, etc.) requires the written consent of the employer. If the employee intends to give lectures or issue publications, he/she requires the consent of SATHOM SARL if the interests of the company are affected.

3.3 Gifts

In principle, the acceptance of gifts or monetary benefits may not be accepted. Exceptions apply in the case of occasional or promotional gifts that are in line with customary practice and courtesy, provided that this is compatible with the respective legal regulations and that any influence on the business decision is excluded from the outset. Accepted gifts must be reported to the direct superior.

3.4 Anti-corruption

No gifts or other benefits may be given or offered, either directly or indirectly, to public or private functionaries or decision-makers with the purpose of gaining an unlawful advantage.

3.5 Complaints

Employees take complaints seriously and are required to respond to them promptly and in accordance with existing rules and to report them to their supervisor.

4. Conduct within the company

4.1 Occupational health and safety

All employees are expected to comply with safety regulations, to be aware of hazards and to participate in all safety-related activities. Recognized accidents, near-accidents or hazards that are considered possible must be reported immediately to the responsible supervisor. Each supervisor is responsible for the protection of his employees and must instruct, train and supervise them accordingly.

4.2 Equality

Cooperation shall be characterized by decency, mutual respect, fairness and trust. Employees may not be discriminated against or disadvantaged on the basis of gender, age, sexual orientation, origin, race, religion, disability or ideological or political convictions. We respect human rights and do not tolerate bullying, abuse of power, sexual harassment or other improper behavior.

4.3 Handling Company Property

SATHOM SARL's company property must be used for its intended purpose with care and protected from loss, theft or misuse.

Expense claims may be made in accordance with the applicable guidelines in the regulations.

4.4 Environment

SATHOM SARL and its employees shall use natural resources responsibly and with care.

5. Implementation and responsibilities

SATHOM SARL supports its employees in implementing and complying with the regulations.

Supervisors have a special role model function and are responsible for ensuring that the company's values are promoted and lived. They ensure that the legal provisions, internal directives and principles of the Code of Conduct are known and adhered to and are the first point of contact for questions regarding their understanding. As part of your management duties, you prevent unacceptable behavior and, if necessary, take appropriate measures to prevent violations of the rules.

Violations of the Code of Conduct should be uncovered, addressed and discussed confidentially. In addition, they can be punished with consequences under labor law, criminal law and civil law.

Every employee is expected to seek advice and assistance from superiors in the event of legal doubts regarding his or her own conduct or if there are indications of legally dubious procedures. In addition, there is the possibility of contacting the HR management under the assurance of strict confidentiality.