

SpanSet Code of Conduct

Introduction

In this Code, the Board of Directors lay down the ethical standards and define the way SpanSet does business. The corporate responsibility to stakeholders is deemed to be the basis for long term success. The Board endorses this Code and needs the whole company to endorse it as well. Failure to do so puts the Company's business and reputation at risk.

Law and regulations

We obey applicable laws and regulations wherever we do business as well as internal Company regulations.

We succeed in competition by enacting our core values of Trustworthiness, Expertise and Interactivity, not by resorting to unfair tactics.

We do not tolerate corruption or bribery of any kind and do not offer or accept inappropriate gifts. Facilitating payments are not tolerated.

Ethical Behaviour

We try to build long term relationships with our clients by anticipating their needs and by providing them with the best products and services for their particular situation.

We avoid situations where private interests potentially conflict with interests of SpanSet. As a firm rule, any such occurrence is documented and reported to superiors.

Company Culture

We know our business is based on our people and we strive to create an environment where talent is strongly encouraged to develop further.

Leaders set an example through their actions for integrity and make sure that the employees know our Code.

We do not tolerate any form of discrimination, bullying or harassment, be it based on race, gender, age or sexual orientation. We specifically avoid sexist jokes and the display of any material with sexual content.

SpanSet employees have the right to a safe and healthy working environment. We also strive to improve the safety in the workplace of our customers: our products and trainings play an important role in protecting users and preventing accidents.

Discipline

Tangible and intangible assets of SpanSet can only be used for business purposes and all employees have the duty to avoid misuse, damage, waste or loss of said assets.

Technical knowhow and operational secrets belonging to SpanSet must be handled with great care as the unauthorized transfer to third parties can cause serious harm to the Company.

Breaking our Code, Company Policies, laws or regulations is deemed unacceptable and will lead to serious consequences, from a warning to demotion or termination. Not only the person breaking rules is exposed, but also direct superiors and any other employee knowing about the occurrence.

Social Responsibility

We respect Human Rights and try to minimize any negative impact on the Environment. Operating under a long term perspective means optimizing the utilization of resources.

We do our best to ensure that our partners abide by same rules as we do.

We do not tolerate child labour under any circumstance, be it directly or indirectly.

Continuity

The whole Company must respect the Code.

Any changes to the Code will be reported to all employees.

We report any violation or potential violation of the Code to superiors; the act of reporting an occurrence will never be reprimanded.

SpanSet employees can contact their superiors regarding any questions or the Helpline directly under conducthelpline@spanset.com

Board of Directors, SpanSet Inter AG
June 2017