

Iskraemeco Group Anti-Corruption and Anti-Bribery Policy

1. Purpose and Scope

1.1 Purpose

The purpose of this Anti-Corruption and Anti-Bribery Policy (the "Policy") is to determine a set of rules which ensure that Iskraemeco holding Switzerland AG and its subsidiaries (the 'Iskraemeco Group') and all its employees, officers, directors, agents, contractors, and third-party representatives (collectively, "Personnel") conduct business in an honest and ethical manner, comply with all applicable anti-corruption laws, and uphold the highest standards of integrity and accountability. This Policy sets forth Iskraemeco Group's commitment to preventing bribery, corruption, and unethical business practices in all jurisdictions in which the company operates. It also defines the due diligence and monitoring procedures and a course of action to be followed in cases of misconduct.

The Policy is aligned with our "Code of business ethics of the Iskraemeco group" and is designed to complement its provisions. Both documents work together to uphold the highest standards of ethical conduct within our organization and are to be read in conjunction. This Policy specifically addresses the prohibition of bribery and corruption, while the "Code of business ethics of the Iskraemeco group" provides broader guidelines on acceptable conduct, including the handling of gifts and interactions with business partners. Together, they ensure that our actions are guided by integrity and transparency in all circumstances.

1.2 Scope

This Policy applies to all Personnel, including full-time, part-time, temporary employees, consultants, student-employees, and third-party agents. It also extends to all operations, including joint ventures and partnerships, regardless of location. All Personnel are required to understand and comply with the provisions of this Policy, as well as relevant laws and regulations, including the applicable national and global legislation. Local laws and regulations may vary in their stringency compared to this Policy. In all cases, the stricter provision, whether it is the local legislation or this Policy, shall take precedence and must be adhered to.

2. Policy Statement

Iskraemeco Group maintains a zero-tolerance policy towards bribery and corruption. The Group prohibits any form of bribery, including the offering, promising, giving, accepting, or soliciting of an advantage as an inducement or a gratitude for action which is illegal, unethical, or a breach of trust. This prohibition extends to direct and indirect actions, including through intermediaries or third parties.

Iskraemeco Group long-term goal: Strive for 0 incidents of corruption, bribery, and ethical non-compliance across our value chain.

3. Prohibited Conduct

3.1 Bribery and Corruption

Bribery involves offering, giving, receiving, or soliciting something of value to influence the actions of an individual in a position of power. This can include money, gifts, favors, or any other benefit. Corruption refers to dishonest and/or illegal behavior reflecting the abuse of entrusted power for private gain, including bribery, extortion, and other unethical practices.

Iskraemeco Group strictly prohibits all forms of bribery and corruption. Personnel must not offer, promise, give, solicit, or accept any form of bribe, whether directly or indirectly, including through third parties. This prohibition includes both public and private sector transactions.

3.2 Facilitation Payments

Facilitation payments are unofficial, minor payments made to expedite routine governmental actions.

All facilitation payments, regardless of their size or nature, are strictly forbidden. Personnel must avoid any action that could be construed as seeking to improperly influence a public official or any other third party.

3.3 Gifts, Entertainment, and Hospitality

Gifts and hospitality refer to items or services of value provided as a gesture of goodwill. While not always illegal, they must not be used to improperly influence business decisions. Gifts, entertainment, and hospitality must always be appropriate, reasonable, and transparent. They must never be given or received with the intent to improperly influence a business outcome. All such exchanges must be documented and reported in accordance with company procedures. As defined in the "Code of business ethics of the Iskraemeco group", gifts are allowed if they meet all the following criteria: the value does not exceed EUR 45, it reflects customary hospitality, and it occurs as a single event. Even under these conditions, offering or accepting gifts during significant negotiations or from public officials is strictly prohibited. All gifts must be reported to the compliance department, except items of symbolic value (e.g. pens or pen drives with the company logo).

3.4 Conflicts of Interest

Personnel must avoid situations where personal interests conflict, or appear to conflict, with the interests of Iskraemeco Group. Any existing or potential conflicts must be fully disclosed to the appropriate supervisor or compliance officer and managed in accordance with company policies. More information on this can be found in our "Code of Business Ethics of Iskraemeco group".

4. Responsibilities

4.1 Employees and Representatives

All Personnel are responsible for understanding and complying with this Policy. They must promptly report any suspicions or concerns regarding potential violations of this Policy through designated channels. Personnel are expected to participate in mandatory training sessions and to seek guidance when in doubt about the propriety of a situation.

4.2 Management

Management at all levels is responsible for fostering a culture of compliance and ethical behavior. They must ensure that this Policy is communicated effectively and that appropriate resources are available for its implementation. Managers are also responsible for monitoring compliance within their areas of responsibility and taking appropriate action in the event of suspected violations.

4.3 Third Parties

Third parties acting on behalf of Iskraemeco Group, including agents, consultants, and contractors, must adhere to the principles outlined in this Policy. Iskraemeco Group will conduct appropriate due diligence on all third parties and require them to contractually agree to comply with this Policy.

5. Reporting and Compliance

5.1 Due diligence process

Iskraemeco Group implements a comprehensive due diligence process for third-party engagements to mitigate risks associated with corruption and bribery. Additionally, it does so to identify and assess actual and potential adverse impacts on human rights and the environment. This process includes a pre-contractual screening of potential partners and suppliers to evaluate their compliance with anti-corruption laws, ethical and environmental standards, and fair business practices (compliance and background check). Continuous monitoring and audits, including audits on ESG topics, are conducted to ensure ongoing compliance. Iskraemeco Group mandates a clear anti-corruption partnership with all third parties, with non-compliance or incidents resulting in immediate termination of the relationship. This rigorous process safeguards Iskraemeco Group's legal, financial, and reputational interests.

5.2 Reporting Mechanisms

Iskraemeco Group encourages all Personnel to report any known or suspected violations of this Policy or any related laws. Reports can be made anonymously through the company's whistleblower hotline or directly to the compliance department. We provide a secure and confidential reporting channel for anti-corruption and bribery concerns via the email address prijavakodeks@iskraemeco.com. Employees can report suspected violations anonymously, ensuring transparency. We maintain a comprehensive set of rules on whistleblower protection, aligned with applicable Global and EU regulations, to safeguard the rights of whistleblowers. These rules guarantee confidentiality and protect employees from retaliation, enabling them to report concerns without fear. Iskraemeco Group ensures that all reports will be investigated promptly and thoroughly, and that confidentiality will be maintained to the extent possible.

5.3 Protection Against Retaliation

As defined in our “Rules on whistleblower protection”, Iskraemeco Group strictly prohibits retaliation against individuals who report violations in good faith. Any form of retaliation will be considered a serious violation of this Policy and will result in disciplinary action, up to and including termination. For more information and specific regulations on whistleblower protection, please refer to the separate document "Rules on Whistleblower Protection" which is to be read in conjunction with this document.

6. Training and Awareness

Upon hiring, all Iskraemeco Group employees are comprehensively introduced to our corporate rules and policies, including the Anti-Corruption and Anti-Bribery Policy, the Code of Business Ethics of Iskraemeco group, and the Rules on Whistleblower Protection. They are informed of our company's core values and strong ethical beliefs. Employees are also briefed on the whistleblowing hotline and the mechanisms in place for reporting corrupt behavior. Furthermore, we conduct annual "compliance" seminars and training sessions, where we educate and remind all employees of our ethical standards and policies, ensuring continuous awareness and adherence to our principles. The training program includes information on how to identify and avoid situations that may lead to bribery or corruption. All Personnel are required to complete the training and pass any associated assessments.

7. Monitoring and Review

7.1 Risk Assessment and Monitoring

Our monitoring mechanism and risk assessment for corruption involve regular employee surveys and feedback mechanisms to gauge awareness and perception of corruption risks. We provide a whistleblowing hotline and an accessible reporting system to detect potential issues early. Additionally, we report on potential incidents in our annual sustainability/ESG and internal compliance report, ensuring transparency and accountability. Anti-corruption and anti-bribery risks were identified through our internal risk assessment and are a part of our risk management process.

7.2 Policy Review

This Policy is subject to review on a triennial basis, or more frequently if necessary, to ensure that it remains up-to-date with applicable laws and best practices. Any changes to the Policy will be communicated to relevant Personnel in a timely manner.

8. Consequences of Non-Compliance

Any personnel found to have violated this Policy may be subject to disciplinary action. Corrective and disciplinary actions may include managing performance (coaching, training), verbal and written warnings, internal action, employment termination, and legal action. Sanctions shall be proportionate to the issue and determined in compliance with applicable local labor laws and procedures. The decision shall be taken by appropriate management personnel. Iskraemeco

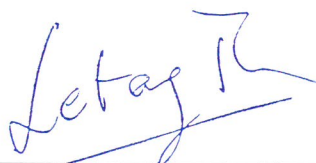
Group may pursue legal action in cases of criminal conduct. The Group will cooperate with law enforcement authorities in the investigation and prosecution of any violations.

9. Approval and Acknowledgment

This Policy shall enter into force on the 5th day following the publication. All Personnel are required to acknowledge their understanding and commitment to comply with this Policy.

In Kranj, on 17. 09. 2024

Iskraemeco Holding Switzerland AG,
Thomas Petuaud-Letang, BOD member



Iskraemeco Holding Switzerland AG,
Bahaaeldin Abdallah, BOD member



