

**RYCHIGER**



# Rychiger Code of Conduct

Code of conduct for suppliers and  
business partners of the Rychiger Group  
Juni 2024

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## 1 Preamble

The Rychiger Group - hereinafter referred to as RYCHIGER - attaches great importance to acting in an ecologically and socially responsible manner and expects the same from its business partners. We consider these principles to be fundamental to successful cooperation between RYCHIGER and its business partners. This Code defines the values and principles of conduct that must be observed by all business partners, their employees and the entire supply chain.

As our business partner, we expect you to feel fully responsible for complying with this Code and to support your business partners and employees in implementing it. Because only by acting consistently in accordance with these principles can we jointly meet our high standards in terms of sustainability and social responsibility.

These values and principles of conduct form the binding foundation for global cooperation between RYCHIGER and its business partners.

The provisions of this Code represent minimum standards and should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable law and, where the law and this Code address the same issue, to apply the provision that provides the greater protection.

## 2 Area of application

The following principles cover all partners who work with or have a relationship with RYCHIGER. This includes suppliers, service providers, customers and other external parties who have a direct or indirect influence on RYCHIGER's business activities. The Code of Conduct applies to all business partners regardless of their location, size or industry. It applies to all aspects of the business relationship. By including all business partners, the Code of Conduct ensures that RYCHIGER high standards are maintained throughout the entire supply chain.

This agreement also extends to third parties who are commissioned by our business partners within the scope of the cooperation. The business partners are responsible for passing on the "Code of Conduct for Business Partners of the Rychiger Group"; this responsibility for third parties lies with the business partners.

## 3 Human rights / working conditions

RYCHIGER's Business partners are committed to the following principles in accordance with internationally recognized human rights and for the prevention of slavery and human trafficking in the supply chain:

- Fair working conditions are guaranteed that comply with the applicable laws and the core labor standards of the International Labor Organization (ILO). Particular emphasis is placed on ensuring that employees are appropriately accommodated within the framework of service and work contracts.
- Business partners promise to protect international human rights and prevent modern

forms of slavery such as human trafficking, forced labor and debt bondage.

- Child labor is avoided at work and young workers are protected from hazardous activities and negative effects on their health and development.
- The goal is to create a work environment free from harassment, intimidation, abuse and unlawful practices, while preventing discrimination based on race, color, religion, gender, age, disability, sexual orientation or other factors.

## 4 Equal opportunities and equal treatment

RYCHIGER's business partners are fully committed to the principles of equal treatment and equal opportunities. Any kind of discrimination is strictly avoided. Regardless of ethnic or national origin, gender, religion, ideology, age, disability, sexual orientation, skin color, political views, social background or other protected characteristics, all employees are treated fairly and equally. Our values focus on creating an inclusive working environment in which every employee has the same opportunities and rights. To ensure that equal treatment and equal opportunities are always guaranteed, these principles are anchored in all our corporate activities.

## 5 Right to freedom of association

RYCHIGER's business partners respect the right of employees to form trade unions and employee representatives in an open working environment, provided this is not restricted by local laws. Business partners respect the right of employees to freedom of association and ensure that employees who campaign for better working conditions do not have to fear negative consequences. Our values focus on upholding the freedom of association and the right to collective bargaining in accordance with applicable law. This includes the right of employees to communicate with management without harassment, intimidation, punishment or reprisals. It also respects the right of employees to terminate their employment after reasonable notice and to receive their full wages. In addition, business partners are required to communicate openly and constructively with employees and employee representatives. Business partners shall, in accordance with local laws, protect the right of employees to freely associate, form and join trade unions, appoint works councils, appoint employee representatives and engage in collective bargaining. Employees who engage as employee representatives must not be disadvantaged so that they can carry out their work without fear of reprisals or discrimination. This ensures that the working environment is characterized by respect, openness and beneficial cooperation between all parties.

## 6 Outlawing forced and child labor

Our commitment to fair working conditions and the protection of children's rights includes an explicit obligation to avoid forced and child labor:

Our RYCHIGER business partners reject any form of forced or child labor. In accordance with the core labor standards of the International Labor Organization and the OECD principles, we avoid the use of child labor in our supply chains. We are committed to ensuring that children and young people under the age of 18 do not work at night or in hazardous conditions. Our

commitment extends to the development of policies and programs that facilitate children's transition to quality education, and we contribute to ending child labor. This is in line with the provisions of relevant ILO standards and underlines our responsibility for fair labor practices and the protection of children's rights. Furthermore, physical abuse or discipline, threats of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation are not permitted.

## 7 Due diligence in the supply chain for minerals from conflict-affected and high-risk areas

RYCHIGER is committed to avoiding any minerals from conflict-affected smelters in its supply chain. This is considered a conflict if they directly or indirectly support armed non-state groups through mining, transportation, trade or export. We require our business partners to provide transparency and information about the smelters or refiners used for minerals such as tin, tantalum, tungsten and gold.

It is the responsibility of our business partners to ensure that the products they supply do not contain mineral metals from conflict areas and do not promote human rights violations. This includes the EU's Conflict Minerals Regulation and the Dodd-Frank Act. Appropriate compliance policies and procedures must be in place to ensure responsible sourcing of minerals in products and to prevent the financing of armed groups. Business partners are required to provide due diligence support and data on mineral resources and supply chains upon request.

Business partners must ensure that no product supplied to RYCHIGER contains mineral metals from conflict areas and promotes human rights violations. Conflict minerals, including tantalum, tin, tungsten and gold, are referred to as "3TG". Our responsibility for responsible mineral sourcing is in line with our principles and an ethical supply chain.

## 8 Fairness in wages and working hours

RYCHIGER business partners undertake to pay their employees fair wages that comply with industry and legal standards. Business partners must provide clear, written contracts in plain language. Fair payment based on collective agreements, local legislation or ILO standards.

- Maximum working hours, rest periods and vacation periods are observed.
- Freedom of association and open communication about working conditions are protected.
- Notice and full payment of wages are respected. Wages and fringe benefits paid for a standard working week are at least equal to national legal standards or industry threshold standards, whichever is higher.
- Business partners must comply with statutory working time requirements and ILO regulations, pay wages regularly and punctually and promote fair and equal pay for equal work.
- All employees must be informed in writing and in a comprehensible form about their working conditions with regard to remuneration before taking up employment and receive a wage statement for the corresponding pay period with each wage payment. Deductions from wages as disciplinary measures are not permitted. Similarly, deductions from wages

that are not regulated by national law are only permitted with the express consent of the employee concerned. All disciplinary measures must be documented in writing.

## 9 Substances and materials

Our business partners are responsible for compliance with legal regulations and directives on materials and substances. These include REACH (Regulation (EC) No. 1907/2006), RoHS (Directive 2011/65/EU), CLP (Regulation (EU) No. 1297/2014), USA. Toxic Substances Control Act and other related regulations. They provide accurate safety data sheets and necessary information and ensure compliance with these regulations.

### **Business partners have a duty:**

- To confirm that all substances and substances regulations have been complied with, including national legislation.
- To work with RYCHIGER to fulfill downstream requirements related to products or services.

### **In addition, business partners are expected to**

- Strive to eliminate banned, restricted or controlled substances where technically feasible.
- Anticipating future regulatory restrictions to ensure procurement continuity.

## 10 Environmental protection

Our business partners must comply with all applicable environmental and health laws, use natural resources sparingly and minimize the environmental impact of the production process and products. Ensuring the environmental compatibility of products and manufacturing processes by reducing emissions, energy and water consumption. Waste avoidance, the recycling of high-quality materials and the safe storage of hazardous substances must also be taken into account.

Our business partners are required to proactively manage health and safety risks and implement systems to reduce their environmental impact. Safety and environmental aspects must be integrated into product and service design. Business partners must also ensure that their products and services meet all safety and quality requirements, provide environmental information and effectively protect employees, partners and external parties.

## 11 Product conformity and safety

Our business partners are responsible for product safety and compliance. The applicable regulations on product safety, labeling, packaging and the use of hazardous substances are strictly adhered to. Products and services must meet the agreed standards upon delivery and be safe for their intended use.

### **Business partners have a duty:**

- Comply with all relevant environmental, health and safety regulations.
- to supply products and services in accordance with safety and quality requirements and, if necessary, to submit CE declarations to RYCHIGER.
- Provide up-to-date information on the environment, health and safety of their products to enable safe use throughout their life cycle.
- protect employees, partners, end users and third parties from potential risks arising from their processes and products.

When it comes to product safety, business partners must follow safety rules, properly label products and communicate handling requirements. All parties involved receive the necessary documentation on hazardous substances, including product information, safety data sheets and instructions for use. Transparent communication about the health, safety and environmental aspects of a product is important.

## 12 Conflicts of interest

In the context of business relationships at RYCHIGER, the focus is on objective decisions by business partners that are not influenced by personal interests. Business partners are obliged to avoid conflicts of interest and to inform all parties of potential conflicts between business and personal matters, including relatives and friends. This openness also extends to the interests or possible involvement of RYCHIGER employees in supplier companies in order to resolve potential conflicts of interest at an early stage. These principles ensure a healthy and reliable business relationship between RYCHIGER and its business partners.

## 13 Prohibition of corruption and bribery

RYCHIGER attaches great importance to combating corruption and encourages its business partners to respect this principle. Improper benefits or advantages such as gifts, invitations or facilitation payments are strictly prohibited, both when they are granted and when they are accepted. Business partners are required to comply with laws against bribery and corruption and to identify and prevent all forms of money laundering and fraud.

Our business partners are obliged to refrain from any form of corruption and bribery, both when granting and accepting improper benefits or advantages. This includes strict compliance with applicable laws and the identification and prevention of all forms of money laundering and fraud. They are prohibited from offering or accepting bribes or unlawful inducements to business partners or public officials. Gifts or gratuities to RYCHIGER employees must not be interpreted as bribery and should not unfairly influence business relationships or violate applicable laws and ethical standards. This Code of Conduct ensures ethical business practices and promotes integrity in the entire corporate environment.

## 14 Fair and free competition and antitrust law

Maintaining fair and free competition is of central importance to RYCHIGER, and compliance with competition law, and in particular antitrust law, is a top priority. Our business partners must ensure fair competition and adhere strictly to the applicable antitrust laws. Business partners ensure that they do not enter into any anti-competitive agreements with competitors, business

partners or customers and do not exchange any information that could impair competition. Furthermore, any dominant market position is not abused.

Business partners working with RYCHIGER must comply with all applicable competition laws and regulations. They may not enter into anti-competitive agreements that affect prices, terms or incentives, and they are required not to exchange confidential pricing information with their competitors. Participation in unlawfully restrictive cartel-like structures or activities is prohibited. In addition, they are not permitted to trade or allow others to trade in stocks or securities on the basis of non-public information obtained in the course of a business relationship with RYCHIGER.

The principles of fair competition and compliance with applicable antitrust laws are of the utmost importance to RYCHIGER business partners. This ensures a legal and ethical business relationship under fair competitive conditions and free from distortions.

## 15 Prohibition of money laundering and terrorist financing

RYCHIGER business partners select their partners carefully and only maintain relationships with trustworthy partners. They take care to prevent money laundering and report suspicious elements to the authorities. Our business partners must refrain from any form of money laundering and terrorist financing and report all suspicious activities immediately. Business partners must strictly prohibit money laundering, fraud and corruption and take appropriate measures. These principles promote integrity and lawful conduct in business relationships.

RYCHIGER business partners ensure compliance with all regulations relating to the import and export of goods, services and information. This includes compliance with the customs and foreign trade laws of all relevant countries and adherence to sanctions lists.

Business partners are obliged to comply with all national and international trade laws and regulations. This includes relevant trade control, export control and sanctions regulations in Switzerland, the European Union and the United States as well as national regulations in the countries in which they operate. They must provide correct export control and classification information, apply for the necessary export licenses and make the required declarations where necessary. Business partners must comply with the export control regulations specific to their business and provide accurate and authentic information to the relevant authorities upon request. This ensures compliance with international trade rules and promotes smooth business transactions in a global context.

## 16 Occupational health and safety

Our business partners are obliged to ensure the health and safety of their employees in the workplace and to take all necessary measures to minimize risks. Business partners protect employees, business partners, users and third parties from process and product risks. They promote durability and safety. A safe working environment takes into account chemical, biological and physical hazards as well as appropriate working conditions to prevent accidents and illnesses.



## 17 Data protection

Our business partners comply with data protection laws with regard to the personal data of employees, customers and other data subjects. They protect confidential information and intellectual property and report data protection violations immediately.

Business partners must comply with data protection laws and protect sensitive information from unauthorized access, destruction or use. Intellectual property rights are respected and data protection breaches are reported. They develop methods to minimize counterfeiting and report any suspicions immediately. Business partners must properly manage confidential information in their systems, protect data from unauthorized access and use personal data only for legitimate business purposes. Information is protected according to the principles of confidentiality, kept only as long as necessary and passed on confidentially to authorized persons. Third parties have access to personal data as part of a duty of protection.

## 18 Security and protection of information, knowledge and intellectual property

RYCHIGER business partners ensure the secure storage of know-how, patents and business secrets of RYCHIGER and third parties. They prevent the unauthorized disclosure or publication of confidential information.

Business partners respect the intellectual property rights of RYCHIGER and third parties and protect them from misuse. They secure confidential and protected data of employees and business partners. Confidential information is used and protected appropriately by business partners. The use of the name or trademarks of RYCHIGER for advertising purposes requires the written consent of RYCHIGER.

## 19 Obligations of business partners

RYCHIGER business partners undertake to comply with the guidelines. They ensure that their employees know and respect these principles and pass them on to their own partners. Business partners should provide reporting channels for their employees and third parties to raise legal or ethical concerns without fear of retaliation. They must prevent, recognize and remedy retaliation.

Business partners must establish effective management systems and governance structures to ensure compliance with laws and codes of conduct. This includes knowledge of and compliance with the law and a commitment and responsibility to implement the principles of the Code. The management system must demonstrate compliance.

## 20 Legal consequences of violations of the principles of this guideline

Compliance with this policy is essential for RYCHIGER. In the event of non-compliance, RYCHIGER may terminate the unusual business relationship. If the business partner takes immediate countermeasures, RYCHIGER shall not be entitled to terminate the contract.

Serious or willful violations of the rules can significantly impair the business relationship between the business partner and RYCHIGER. RYCHIGER may request information and conduct audits to verify compliance. In the event of a violation, corrective measures must be taken. Repeated non-compliance can lead to the termination of the business relationship.

The Code of Conduct should not affect existing contracts. In the event of contradictions, the provisions of the contract shall take precedence, unless otherwise agreed.

## 21 Additional information

Information on violations of this Code of Conduct and the basic values and principles set out therein can be submitted in confidence via [procurement.ryag@rychiger.com](mailto:procurement.ryag@rychiger.com).

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