

Our Code of Conduct

Values, principles and rules



Driven by your trust.



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Trust is the basis for our business

Dear Colleagues,

We have been developing and producing small calibre ammunition for the security and defence sector at our site in Thun ever since we were founded in 1863. Our innovative ideas and bold moves have seen us evolve from a trusted supplier of ammunition for the Swiss Armed Forces, to a strategic partner for armed forces and authorities all over the world.

Although much has changed over the years, we are committed to continuity and put gaining and maintaining the trust of our customers at the heart of everything we do. And for good reason: trust forms the basis of all our business relationships, and maintaining this trust is crucial to our shared success. We can only succeed in this if we develop our company responsibly and with a focus on sustainability.

A sense of responsibility and sustainable development are decisive factors in everything we do. By respecting the principles set out in this Code of Conduct, we ensure that we nurture common values and principles and live up to these – both within our company and in our dealings with relevant stakeholder groups. In this way, we create a common foundation for all our various business activities building on a sense of responsibility, trust, open communication, fairness and respect for people and the environment.



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Introduction

To succeed, we must treat those around with respect and anticipate their needs. To this end, we cultivate a hands-on, innovative and fearless culture based on trust and on ethically correct and compliant conduct.

What sets us apart is our proactive mindset and trust inspiring conduct – with respect to colleagues, customers, and other internal and external stakeholders. We are ambitious, act with courage and always look ahead. This Code of Conduct reflects our identity and helps us live out our values and principles in everything we do. Both now and in the future.



Scope of application

The Code of Conduct is binding for all employees of SwissP Defence. It is the duty of our managers to ensure that this Code of Conduct is observed within their areas of responsibility. This includes setting a good example on compliance issues, reminding all employees continuously of the content of the Code of Conduct, and providing them with guidance and advice.



Breaches

Actions that breach our Code of Conduct can damage the company's reputation and result in legal action being taken against the company and our employees. We therefore have a zero-tolerance policy towards breaches of the Code of Conduct or applicable law and subject these to appropriate sanctions.



Sanctions

Depending on the gravity of the breach in question, such measures may range from reprimands and warnings to immediate dismissal, or to civil claims for compensatory damages and criminal prosecution. A breach of the Code of Conduct also includes deliberately ignoring any infringements of the code by others or impeding any investigation of breaches.



Reporting

All employees are encouraged to speak up immediately if they have any questions or concerns, and to report information about (possible) breaches. Employees can contact the following persons for this purpose: managers, members of HR dept. or members of the employee representation committee (ERC). All concerns are taken seriously and all information – especially relating to personal identity – will be treated in confidence upon request. Reports or tips can also be submitted anonymously via our secure system (“Integrity Line”).



Integrity Line
swisspdefence.integrityline.io

Framework conditions

As a company operating in the heavily regulated security and defence sector, we bear a great responsibility towards authorities both at home and abroad. We adhere strictly to the applicable national and international regulations and laws, and to instructions issued by the respective authorities. If certain external conditions are less strict than our own standards, we always apply our SwissP Defence standards.

Laws and regulations

In particular, we comply with the Federal Act on War Materiel (KMG) and the Federal Act on the Control of Dual-Use Goods and of Specific Military Goods (GKG).

Trade compliance and export controls

In international trade, we comply without exception with the regulations prescribed by national customs and tax authorities and by international agreements. We supply our products and system solutions only to identified, reputable business partners, and by so doing make an important contribution to security, independence and stability. All exports are in compliance with international law, Switzerland's international obligations and the principles of Swiss foreign policy.

Promise and values

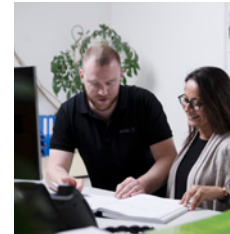
Our promise and our values apply to all of us. They state what we at SwissP Defence stand for and define the demands that we place on ourselves. They express an integral part of our corporate DNA and form the basis for our daily work and our conduct. This promise and these values shape not only our actions, but also our communication and processes.

Our promise

The mission success of our customers serves the safety and security of all of us. We are keenly aware of this. Because when it comes to ensuring safety and security, reliability and unconditional trust are what counts. Living up to this trust is what drives us and is at the heart of everything we do – today and in future.

**Driven
by your
trust.**

Our values



We are committed

We engender trust, we are reliable and transparent

We and our solutions can be relied upon. We are experts in our field, demonstrate uncompromising reliability and communicate openly and transparently.



We are ambitious

agile, passionate and courageous

We are agile and do not settle for second-best solutions. We put our heart and soul into developing innovative ideas and making bold decisions.



We are convincing

quality-conscious, we perform and we are smart

We make our mark with a unique combination of outstanding quality, maximum performance and commercial acuity. We do not just satisfy our customers – we enthuse them.

10 golden rules

We live up to trust placed in us every day. We set our sights high, act responsibly, keep our word and abide by established internal and external rules:

1. **We are enterprising and responsible.**
2. **We engender trust and justify the trust placed in us.**
3. **We keep our word: we say what we do and do what we say.**
4. **We are reliable, act honestly, communicate clearly and take responsibility for what we do.**
5. **We carefully protect all business secrets entrusted to us.**
6. **We cultivate open and honest dialogue, and foster a culture that deals constructively with mistakes.**
7. **We learn from our mistakes so we can grow as a company.**
8. **We stand out from our competitors by virtue of our performance, expertise, quality and innovation.**
9. **We abide by existing rules – even in difficult situations**
10. **We do not overlook or fail to observe these ground rules in the interests of business success.**



Zero tolerance of corruption

SwissP Defence applies zero tolerance to corruption and rejects any and all forms of bribery, venality and any other corrupt behaviour.

Our obligations

All forms of bribery and corruption are strictly prohibited. This includes, in particular, offering, promising, granting or accepting benefits with a view to winning orders or obtaining unlawful discounts. In the same way, no gifts may be accepted that could influence SwissP Defence own decision-making process. Gifts must always be legal, impartial, appropriate, proportionate and transparent.

Presents or other gifts should only be offered, given or received in good faith and only if they are appropriate and in keeping with customary business hospitality.

Exceptions are possible if there is danger to life or limb or to personal safety.



Fair competition

SwissP Defence is committed to fair competition – always and at all times.

Our obligations

We compete fairly with our competitors for market share and comply with the national antitrust and competition laws. The purpose of this legislation is to protect free competition and prohibit, among other things, fixing prices or agreements on dividing market segments. All employees must ensure that no information is exchanged in communication and correspondence with competitors that could permit conclusions to be drawn about current or future market strategy.

Equal opportunities and non-discrimination

SwissP Defence offers equal opportunities to all employees and condemns any form of discrimination, harassment or bullying.

Our obligations

We expect all employees to interact with each other in a respectful manner, irrespective of any differences and diverging personal views.

SwissP Defence promotes an integrating culture and does not tolerate any discrimination on the grounds of age, ethnic origin, philosophy, religion, skin colour, nationality, political or other convictions, gender, sexual orientation, physical condition, marital status or affiliation with employee representative bodies. This also includes gender-inclusive and non-discriminatory language, whereby we endeavour to address all persons in a fair and equitable way.

We are also committed to paying fair and gender-neutral wages.





Open corporate culture

We promote a culture of active co-determination and welcome the active and constructive participation of employees.

Our obligations

At SwissP Defence, we encourage open, honest, transparent, direct and clear communication. Wherever possible, we provide transparent and timely information about relevant events. We encourage our employees to get actively involved and take on responsibility so they can grow and adapt to evolving challenges. We promote a constructive error culture where people talk openly about mistakes and draw lessons from them. In this way, we empower our employees to be self-assured and to think and act holistically.

Data protection and information security

SwissP Defence observes applicable data protection legislation and undertakes to protect and keep confidential all information entrusted to it.

Our obligations

SwissP Defence only gathers, stores, processes and uses personal data for permissible commercial purposes or insofar as necessary, and always only on a legal basis or with the consent of the parties concerned. Our employees are obliged to keep confidential and – where prescribed – not disclose any proprietary or third-party business and trade secrets with which they have been entrusted or of which they have become aware in the course of their employment. This applies in particular to information about technologies or manufacturing, research and development processes and to facility and financial data and customer information.



Environment, health and safety

All SwissP Defence employees have the right to work in a healthy and safe working environment. In addition, we strive to make sustainable improvements to our own processes, products and services while giving due consideration to the environment.

Our obligations

In its capacity as employer, SwissP Defence ensures a healthy and safe working environment and protects its employees against excessive exposure to chemical, biological and physical risks.

We adhere to the internal rules governing health and safety at the workplace and make an active contribution to continuously improving these aspects in our own working environment. In so doing, we carry a shared responsibility for the health and safety of our colleagues.

We take our environmental responsibilities seriously by promoting new technologies and making consistent improvements in this area.

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