



# CODE OF CONDUCT

Version December/2023

## 1 PRELIMINARY REMARKS

### 1.1 Application of the Code of Conduct

This Code of Conduct applies to the directors, officers and employees of 3A Composites Group and its business areas, subsidiaries and related companies over which it has control. Any employee violating the law, this Code of Conduct or policies and standards of 3A Composites may face disciplinary actions, up to and including dismissal. 3A Composites Group's parent company is Schweiter Technologies AG, a company with registered offices in Steinhausen, Switzerland, whose shares are publicly traded on the SIX Swiss Exchange.

Those in managerial positions have a special responsibility to lead with integrity by example. They should seek to ensure that employees and contractors under their oversight are aware of and comply with this Code of Conduct.

The Code of Conduct is not just for employees. All consultants and suppliers are equally expected to adhere to this Code of Conduct in all their dealings with or on behalf of 3A Composites. Through appropriate contractual arrangements and procurement principles, consultants, agents, contractors and suppliers of 3A Composites are equally expected to comply with this Code of Conduct in all their dealings with or on behalf of 3A Composites. We must ensure that they are aware of the contents of the Code of Conduct, either by providing them with a copy or by referring them to the dedicated page on 3A Composites' website ([www.3acomposites.com](http://www.3acomposites.com)). Consultants, agents, contractors or suppliers, who fail to respect this Code of Conduct, may see their contract terminated or not renewed.

Throughout this Code of Conduct, the term "3A Composites" or "Company" refers to 3A Composites Group as well as its parent company, Schweiter Technologies AG, and any of their business areas, subsidiaries, related companies or other legal entities in which 3A Composites Group or a related company holds a controlling interest, and the term "Group" or "3A Composites Group" means the group of companies comprising all such legal entities controlled by or controlling the 3A Composites Group.

### 1.2 Compliance in General

3A Composites is a multinational business with operations around the world. In every country in which 3A Composites operates, all its personnel is expected to work with integrity and to comply with the law, this Code of Conduct and any and all policies and standards of 3A Composites Group. Ignorance of the law is not an acceptable reason for non compliance, so we must all be familiar with the applicable laws that relate to our work.

Ethical practices that are clearly understood and consistently followed are the means to strong and sustained growth. They enable us to build a competitive company while doing what is right. It is our firm belief that our Code of Conduct is a fundamental component of our success.

If you do not feel comfortable with any of the answers, then ask yourself whether you should really do it. If you are unsure about what to do, or if you are in doubt about whether to apply this Code of Conduct or the laws of your local jurisdiction, speak with your supervisor or, if preferred,



get in touch with any of the other points of contact indicated in this document (cf. section 5.3). In any event, be transparent in what you are doing.

We recognize that there may still be grey areas where reasonable people may disagree. We welcome and encourage open discussion in these situations.

An effective code must be more than a paper or web document. It must be known to all employees and live through their actions. To ensure that the Code is more than just a good concept, it is made available to all 3A Composites employees, consultants and suppliers, all of whom are bound by its principles in their dealings with or on behalf of 3A Composites.

Should you become aware of conduct which is in violation of the law, the Code of Conduct or policies and standards of 3A Composites, you have a responsibility (subject to local laws) to report it using one of the reporting mechanisms set out in the section “Asking questions and reporting violations” (cf. section 5.3).

## 2 THE WORKPLACE

### 2.1 Human Rights

**At 3A Composites we support human rights consistent with the Universal Declaration of Human Rights** and we respect those rights in conducting our operations throughout the world. 3A Composites is guided by principles of non-discrimination, respect for human rights and individual freedom and conducts its global business in a manner that makes it an employer of choice. We commit to neither tolerate nor contribute to threats, intimidation, or attacks against human rights defenders in relation to their operations to create safe and enabling environments for civic engagement and human rights at local, national, or international levels.

### 2.2 Respect for Employees’ Dignity and Rights

**We respect the rights and dignity of employees throughout its operations and those of its business partners.** Respect is central to a harmonious workplace, where the rights of employees are upheld and where their dignity is affirmed, free of intimidation, discrimination or coercion of any kind. We comply with applicable laws and regulations, including the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organization ILO. We also regularly engage with our external stakeholders and always strive to contribute, both directly and indirectly, to the general wellbeing of the communities in which we operate.

Therefore, at 3A Composites we:

- ⇒ prohibit discrimination on the basis of race, gender, national origin, religion, age, sexual orientation or politics;
- ⇒ forbid using inappropriate language in the workplace, including profanity, swearing, vulgarity or verbal abuse;
- ⇒ do not allow coercion or intimidation in the workplace;
- ⇒ oppose and do not permit the use of forced or of child labor;
- ⇒ recognize the right of all employees to choose to belong or not belong to a union and to seek to collective bargain agreements;



- ⇒ implement equitable and transparent remuneration systems; and
- ⇒ work to improve employment skills and competencies by regular performance reviews and undertake education, training and coaching as appropriate.

**Sexual or workplace harassment as well as violence is not tolerated at 3A Composites.**

Sexual harassment may include unwanted sexual advances, sexual jokes, subtle or overt pressure for sexual favors, sexual innuendoes and offensive propositions. Workplace harassment includes threats, intimidation, bullying and subjecting individuals to ridicule or unwarranted exclusion. Sexual or workplace harassment may result in adverse working conditions, including:

- ⇒ the creation of an intimidating, hostile or offensive work environment;
- ⇒ interference with an individual's work performance; and/or
- ⇒ unfair limitation of an individual's opportunities for employment or advancement.

Report any such behavior or concerns, particularly about your personal safety or that of your colleagues (cf. section 5.3). When the Company believes that harassment or violence has occurred, appropriate disciplinary action will be taken against those responsible, which may include dismissal.

## **2.3 Workplace Security**

**We are committed to ensuring the safety of its employees as well as the security of its assets.** In accordance with local laws, representatives and security staff of the 3A Composites Group are permitted, in accordance with local laws to direct the search of persons, vehicles or property that are on 3A Composites premises. All employees as well as suppliers, consultants, etc. are expected to cooperate by allowing a search of their persons and property when on 3A Composites premises.

## **2.4 Environment, Health and Safety**

**At 3A Composites, our goal is to protect and promote environment and the health and safety of its employees and the communities where 3A Composites is operating.**

### **2.4.1 Environment**

**We aim at preventing, or otherwise minimizing, mitigating and remediating, harmful effects of its operations on the environment.** 3A Composites builds its environmental performance on compliance with all environmental laws and regulations. 3A Composites supports and encourages further action by helping to develop and implement voluntary commitments. 3A Composites similarly approaches a comprehensive understanding of the full life cycle and safe use of our products to ensure that all their benefits are delivered. Wherever possible we prevent reduce and remedy the disturbance of the environment.

### **2.4.2 Health**

Recognizing that healthy and productive employees are essential to the success of 3A Composites, **we are committed to protecting health and wellbeing of its employees** and in preventing occupational illness.



### 2.4.3 Safety

**We are committed to an incident and injury free workplace. Our goal is zero harm.** Everyone's behavior contributes to an incident and injury free workplace. 3A Composites is building on a sustainable safety culture that requires visible and committed leadership, a high level of participation from employees and contractors, and the development of a learning and an actively caring workplace.

### 2.5 Alcohol and Drugs Impairment

**It is forbidden to possess or consume illegal drugs, or be impaired by alcohol or drugs, while working on 3A Composites business or premises.** The consumption of alcohol during working times is not permitted. To remain competitive in today's business environment, it is essential that we take the best decisions; therefore, we expect that all our judgments be clear and unimpaired by drugs or alcohol at all times.

For special occasions (such as jubilee or farewell celebrations) the site supervisor may exceptionally permit the use of a modest quantity of alcohol after close of business. Employees who need to resume work after the meeting must not consume alcohol at such gatherings.

## 3 BUSINESS PRACTICES

### 3.1 Books and Records

**All Group records must give a true and fair view of the state of our business affairs.** We must ensure that all financial transactions are properly recorded in the books of account and in compliance with 3A Composites' accounting and reporting procedures, which we apply consistently and by using reasonable and careful judgment.

We must not intentionally cause 3A Composites' records to be incorrect in any way, nor create or participate in the creation of any records that are intended to conceal anything improper. All disbursements of funds must be properly and promptly recorded.

We maintain a sound system of internal control which includes risk analysis and review of our financial, operational and compliance controls. Employees of 3A Composites are required to cooperate with internal and external auditors and to report any knowledge of any untruthful or inaccurate statements or records or transactions that do not seem to serve a legitimate commercial purpose.

Unusual financial arrangements with a customer or a supplier (such as, over-invoicing or under-invoicing) or payments on their behalf to a party not related to the transaction are not permitted. As far as practicable, contracts to which 3A Composites is a party should be in writing, leaving as little uncertainty as possible.

Suspected breaches of financial policy, which are directly or indirectly related to the business of 3A Composites, must be reported and investigated.



### 3.2 Fair business practices

**At 3A Composites we aim to carry out our business fairly and with integrity.** In our dealings with customers, we must be clear, concise and fair. Where comparisons are permitted by law, we must compare our products, services or employees to those of our competitors fairly and on the basis of objective criteria.

We must also ensure that our products meet all relevant legal standards for health and safety. Accordingly, we need to be alert to product liability concerns and, where applicable, warn our customers of any inherent dangers in the products sold.

In procurement, 3A Composites expects to participate in a fair and competitive marketplace. We provide a fair evaluation and selection process to all prospective suppliers. On the other hand, 3A Composites requires its suppliers to maintain their own policies that support fair competition and integrity, requires adherence to applicable laws, standards and regulations, and prohibits giving or receiving bribes.

### 3.3 International business

We operate on a global basis and are therefore subject to national and local laws, regulations and risks that vary from one country to another. In particular, we must:

- ⇒ ensure that payments made to agents or distributors are always for services rendered, that they are reasonable considering the nature of those services and that they are made to a bank account in their name and the jurisdiction of domicile;
- ⇒ ensure that taxes and duties paid to public officials are legitimate and do not constitute bribery;
- ⇒ observe all export regulations that govern the shipment of 3A Composites products and services to the importing country, as well as international trade agreements that apply

### 3.4 Conflicts of Interest

**We must ensure that our personal activities and interests do not conflict with our responsibilities to 3A Composites.** It is essential that we remain free of, or disclose, commitments and relationships that involve, or could involve, a conflict of interest with 3A Composites. **It is important that even the appearance of a conflict of interest be avoided.**

A conflict of interest can exist if an employee has a direct or indirect personal interest in a decision being made where that decision should be made objectively, free from bias and in the best interests of 3A Composites. Conflicts of interest may involve, among other things:

- ⇒ outside work or employment;
- ⇒ an outside business relationship with, or interest in, a supplier, customer or competitor;
- ⇒ a business relationship on behalf of 3A Composites with any person who is a relative or a personal friend, or with any company controlled by such a person;
- ⇒ a position where you have influence or control over the job evaluation or compensation of any person who is a relative, spouse or personal friend;



- ⇒ personal use or sharing of 3A Composites confidential information for profit, such as buying or selling, or advising others to buy or sell 3A Composites property, products or raw materials on the basis of this information; and
- ⇒ an acceptance of personal benefits, such as something more than a modest gift or entertainment, from a person or organization dealing, or expecting to deal, with 3A Composites in any type of business transaction.

Anything that could present a conflict of interest to an employee could also present a conflict of interest if it is passed on to a family member or a third party who is receiving benefits for the employee. Common sense and good judgment must be exercised to avoid any perception of impropriety or conflict of interest.

If you believe that you may be affected by a conflict of interest, you must immediately disclose all relevant details to your supervisor.

### **3.5 Competition Issues**

At 3A Composites we believe in a free market economy, because it guarantees that our hard work and innovation will be rewarded. It is our policy to compete vigorously and effectively while always complying with the applicable competition or antitrust laws and regulations in all countries in which we operate. We must act independently and in our own interest in all commercial situations affecting competitive conditions of trade and avoid practices that restrict competition.

Therefore, in accordance with the requirements, we commit to:

- ⇒ never enter into any agreement or tacit understanding with our competitors, and avoid discussing or even sharing competitive issues on such matters as:
  - the price or other terms on which 3A Composites or any of our competitors sell products;
  - the costs incurred or profits made by 3A Composites or any of our competitors in manufacturing products;
  - the rate of production or percentage of capacity utilization of 3A Composites or any of our competitors;
  - the customers to whom, or territories in which, 3A Composites or our competitors sell products; and
  - the type or amount of any product that 3A Composites or our competitors will manufacture or offer for sale;
- ⇒ when participating in joint ventures and industry associations involving competitors, limit communications to those actually required for the legitimate business of the joint endeavour;
- ⇒ deal fairly with all customers and suppliers, including those with whom we also compete;
- ⇒ respect our customers' freedom to conduct their business as they see fit, including the setting of prices at which they wish to sell their products;
- ⇒ avoid any use of coercion in the sale of products to customers, such as forcing a customer to purchase unwanted products;



- ⇒ refrain from using any market power or market information in a way which may restrict competition; and
- ⇒ avoid any unfair or deceptive act or practice.

Be mindful of the antitrust risks presented by trade and professional association meetings. As employee of the 3A Composites Group you are required to:

- ⇒ attend only meetings of legitimate trade and professional associations held for proper business, scientific, or professional purposes.
- ⇒ discuss any questionable agenda items with your supervisor or with a company lawyer before you attend the meeting.
- ⇒ Leave the meeting and promptly advise your supervisor or a company lawyer if you observe any activity at an association meeting that appears to be illegal or suspicious.

### 3.6 Bribery and Corruption

**We must not offer, promise or give, demand or accept any improper payments or undue advantage when acting on behalf of the Company.** 3A Composites funds must not be used to make payment, directly or indirectly (through intermediaries or otherwise), in money, property, services or any other form to a government official, political party or candidate for political office to induce the recipient to exert influence to assist the Company in obtaining or retaining business or any improper advantage in the conduct of our business.

We must also be aware of the potential for commercial agency arrangements to be used as a cover for bribery. Examples of warning signs that should trigger due diligence or result in an investigation include, amongst others, unusual payment requests, requests to split payments (or other consideration) into small amounts, 'promotional' funds or accounts or requests to be paid in a different currency or in a different location than the domicile of the agent, or at a different address than appropriate for such payments.

### 3.7 Gifts and entertainment

**Accepting gifts and entertainment from business partners or offering such favors undermine our credibility.** It makes 3A Composites vulnerable to accusations that business decisions are influenced by factors others than merit. Therefore you must not offer, make, seek or accept gifts, payment, entertainment or services to actual or potential business partners which might reasonably be believed to influence business transactions, which are not within the bounds of customary business hospitality or which are prohibited by applicable law.

In certain circumstances, the giving and receiving of modest gifts and entertainment is perfectly acceptable. A business meal, for example, can provide a relaxed way of exchanging information. Nonetheless, depending on their size, frequency, and the circumstances in which they are given, they may constitute bribes, political payments or undue influence.

The key test we must apply is whether gifts or entertainment could be intended, or even be reasonably interpreted, as a reward or encouragement for a favor or preferential treatment. If the answer is yes, they are prohibited under this Code of Conduct.





### 3.8 Conflict Minerals

3A Composites does not knowingly purchase the conflict minerals *tin, tantalum, tungsten* and *gold*, also referred to as “3TG”. We are working towards ensuring that our products also in the future do not contain Conflict Minerals that have been sourced from regions that support or fund conflicts.

### 3.9 Insider trading

As the shares of 3A Composites’ parent company, Schweiter Technologies AG are listed on the SIX Swiss Exchange, we must refrain from buying or selling Schweiter Technologies AG securities while in possession of material non-public information about Schweiter or 3A Composites or any of its business areas and refrain from passing such information on to others, which includes family and friends. We must also ensure that when handling such information we do so with the appropriate care.

3A Composites and Schweiter Technologies have both separate rules that govern key employees with access, or potential access, to “inside information”, in their dealings in Schweiter Technologies AG’s securities.

## 4 Group assets and information management

### 4.1 Employee use of Group property

3A Composites property and financial resources are for the sole use of the Group.

Therefore, we must not:

- ⇒ obtain, use or divert 3A Composites property for personal use or benefit;
- ⇒ materially alter or destroy 3A Composites property without proper authorization; or
- ⇒ remove 3A Composites property or use 3A Composites services without prior management approval.

Some activities may have benefits to 3A Composites as well as to an individual employee and the distinction between the two may be difficult to establish. Accordingly, it is important that any use of 3A Composites property or services that is not solely for the benefit of 3A Composites be approved in advance by your supervisor.

Any suspected fraud or theft by employees or third parties must be reported.

### 4.2 Employee use of electronic resources

**Electronic resources provided by 3A Composites must be used responsibly, appropriately and ethically.** “Electronic resources” include, for example, e-mail, instant messenger, telephone, fax and voice mail, internet and network access, databases, two way radios, and closed circuit television.

We must never engage in inappropriate use of 3A Composites electronic resources. Some examples of inappropriate use include:





- ⇒ any use that relates to material which is offensive, sexually explicit, defamatory, discriminatory, abusive, harassing or violent;
- ⇒ knowingly causing any material (including software) to be used, copied or distributed in breach of confidentiality or copyright obligations;
- ⇒ online gambling;
- ⇒ deleting or attempting to destroy electronic records which are, or are reasonably likely to be, required as evidence in a legal proceeding or regulatory investigation; and
- ⇒ intentionally introducing a computer virus.

E-mail is not entirely secure and may be susceptible to interception and creates a permanent record. Any e-mail you send may be printed by the recipient and forwarded by the recipient to others, and may be retained on Company computers for a substantial period of time. Therefore, you should exercise the same care, caution and etiquette in sending an e-mail message as they would in normal written business communications.

Incidental personal use of 3A Composites electronic resources is permitted if it is moderate and does not interfere with work duties. Abuse of this privilege is regarded as misconduct.

In relation to your Company Internet connection, you must not access sites, or download any data that is unprofessional or inappropriate for business use. 3A Composites reserves the right to monitor and block the use of the internet, email and other electronic resources at any time to the extent permitted by local legislation.

Your password must be kept secure at all times and must not be shared with third parties, nor with other staff members. To prevent abuse, you will be requested from time to time to change your password.

3A Composites must retain anything that may constitute a business record (such as electronic documents and email) for as long as necessary, even after the departure of the employee who produced the business record.

#### **4.3 Confidential information**

**We must always protect confidential information of 3A Composites as well as the confidential information entrusted to us by others (eg. customers and suppliers).**

Confidential information includes, for example, technical information about products or processes, equipments, materials, formulations or inventions, whether patentable or not; vendor lists or purchase prices; cost, pricing, marketing or service strategies; non-public financial reports; and information related to divestitures, mergers and acquisitions.

Confidential information is a valuable asset that could benefit a competitor if known to it or otherwise harm the Company if made public. We must be careful not to disclose such information to unauthorized persons, either within or outside 3A Composites, and must exercise care to protect the confidentiality of such information received from another party.

In safeguarding confidential information, we must:

- ⇒ be careful where and when we discuss confidential information of 3A Composites;
- ⇒ be careful about where and how we store it;



- ⇒ not disclose or use any of it for personal profit or advantage; and
- ⇒ enter into confidentiality agreements with persons outside the 3A Composites Group before entering into discussions on anything that is, or may be, confidential.

When approached with any offer of, or request for, confidential information, it is important that both parties understand and accept conditions under which the information may be received.

#### 4.4 Intellectual property

**We protect 3A Composites' patents, trademarks and other forms of intellectual property and respect the intellectual property rights of others.** Owners of intellectual property have rights granted to them under the law.

Our intellectual property is among the most valuable assets of the 3A Composites Group. In order to protect our intellectual property, we must:

- ⇒ become familiar with all internal policies and procedures relating to intellectual property and brand use;
- ⇒ be aware of potential infringement of our intellectual property rights (ie. unauthorised use) by employees, customers, suppliers and competitors;
- ⇒ not allow our customers, suppliers or business partners to use any of our trademarks without appropriate approval; and
- ⇒ ensure that third parties sign a secrecy agreement as necessary to protect our intellectual property.

We must also respect the intellectual property rights of others, such as our suppliers and customers. This is particularly important to remember before we copy or distribute written or electronic materials.

#### 4.5 Data privacy

**We regard the lawful and correct treatment of personal data as being of utmost importance.** We must protect the personal data (that is all information relating to any identifiable individual) collected for business purposes. In accordance with the requirements of applicable privacy and data protection laws, personal data is subject to controls to prevent unauthorized or unlawful processing, accidental loss, destruction or damage.

### 5 Government, media and investor relations

#### 5.1 Government relations

In the conduct of our business, government relations include all contacts with governments, their agencies and representatives, in national and local jurisdictions around the world. Many employees interact with various government agencies on a routine basis in accordance with established practices and procedures.

Though customs may vary from one country to another, there is only one standard for 3A Composites representatives, and that is **conducting ourselves according to the highest ethical standards in all our dealings with governments.**



In our interactions with governments, we:

- ⇒ will cooperate with every legitimate government request for information or cooperation in regulatory investigations;
- ⇒ must take appropriate steps to protect confidentiality when submitting information to any authority;
- ⇒ must not retain a government employee to perform services except under written contract with the government specifying the legitimate nature of the services to be provided. In some countries, hiring a government employee for any work is prohibited; and
- ⇒ limit gifts to, or entertainment of, government representatives so that we neither violate the law nor compromise – or appear to compromise – the individuals involved or 3A Composites in any way.

We will cooperate with every legitimate request for information from government sources. Nevertheless, we must assert 3A Composites' basic legal rights, such as representation by counsel, where appropriate. Consequently, if a government authority requests information or access to files or presents a search warrant, be polite, ask the officers for proof of identification let the officers know that the matter must first be discussed with a company lawyer and contact a company lawyer without delay. Ask the officers to wait in the reception area until the most senior person on site and/or a company lawyer arrives. **Never destroy 3A Composites documents in anticipation of a request for those documents from a government agency.**

## 5.2 Communicating with media and investors

**We communicate with the media and investors in an accurate and consistent manner.** Communicating with the media, investors and analysts is the responsibility of 3A Composites spokespersons. All spokespersons, or anyone dealing with the media or investors, must demonstrate high standards of integrity and transparency, while refraining from unauthorized or selective disclosure of proprietary or non-public information.

Requests from investors or shareholders for information concerning 3A Composites and its business should be forwarded to the Investor Relations spokesperson at 3A Composites corporate headquarters.

Media interaction is the responsibility of the Media Relations spokesperson at 3A Composites corporate headquarters, who ensures the timely and informed communication of relevant information.

You should make sure these spokespersons know about any relevant issue of local or national interest that relate to 3A Composites' business of which they may not be aware.

## 5.3 Asking questions and reporting violations

All 3A Composites employees, consultants and suppliers are expected to comply with this Code of Conduct and actively support its values and principles.

Any employee who fails to comply with the Code, or who withholds information during the course of an investigation regarding a possible violation of it is subject to disciplinary action up to and including dismissal. Any consultant or supplier who fails to comply with the Code may see his or



her contract terminated or not renewed. Depending upon the nature of the noncompliance, 3A Composites may have the legal obligation to report the non-compliance to the appropriate authorities.

Breaches of the Code must be reported immediately to one of the following:

- ⇒ your supervisor;
- ⇒ your department or function head;
- ⇒ a company lawyer;
- ⇒ your Human Resources department;
- ⇒ such other means that 3A Composites may from time to time make available (i.e., designated telephone lines to raise serious issues and inappropriate behavior to the attention of senior management).

All information will, to the extent possible, be received in confidence. All information obtained through the above reporting channels will be followed up. No action will be taken against anyone for reporting in good faith a suspected violation of the law or this Code of Conduct. However, anyone who takes part in a prohibited activity may be disciplined. An employee's decision to report will, in all cases, be given due consideration in the event any disciplinary action is necessary.

The Code was approved in English. In case of any doubt or discrepancy with translations into other languages, the English version shall prevail.