
Code of Conduct for Ethical Business Practices Feintool Group¹

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¹ Feintool International Holding AG and all subsidiaries and affiliates. Feintool International Holding AG is a stock company listed on the SIX Swiss Exchange (ISIN CH0009320091).

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PREAMBLE

The Feintool Group (hereinafter «Feintool») is a global technology company active in the field of fineblanking with proven expertise in forming and electro lamination stamping. As a driver of innovation, the Group's mission is to continuously expand technology horizons. Feintool develops intelligent solutions for the customers and their demanding industrial applications and thus is designed to shape the future of mobility with high-performance sheet metal technology.

The Code of Conduct for Ethical Business Practices (hereinafter «CoC») – aligned with the mission of the Group – defines the important standards for doing business at Feintool and provides the foundation for long-term success. The Group's reputation and the confidence placed in it by customers, suppliers, business partners, shareholders, and the public depend substantially on all employees respectively workers (both terms were used synonymously in this CoC) behaving responsibly. The CoC is handed out with the employment contract, must be signed by each employee and serves as a tool to act appropriately. It applies to all workers at all levels of the plants and companies under the managerial control of Feintool.

The Feintool Executive Board underlines that the company, as well as each employee, is strictly committed to operating in full compliance with the laws, rules, and regulations of the countries in which the Group operates. In no case can complying with the CoC violate local laws. To go beyond legal compliance and to advance social and environmental responsibility and business ethics Feintool is drawing upon internationally recognized standards: In alignment with the UN Guiding Principles on Business and Human Rights, the provisions in this CoC are derived from and respect internationally recognized standards including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights (see list of references below).

This revised CoC is divided into five sections:

- Sections A, B, and C outline standards for labor, health and safety, and the environment.
- Section D adds standards relating to business ethics.
- Section E outlines details of implementation, monitoring, and review.

Thus, the Feintool CoC is designed to meet global requirements in the area of corporate governance, business ethics, human rights, and working standards as well as environmental responsibility.

For suppliers, see Feintool's Supplier Code of Conduct.

A. LABOR

Feintool is committed to upholding the human rights of employees and treating them with dignity and respect as understood by the United Nations. This applies to all workers, male, female, or X, including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are:

A.1 Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons using threat, force, coercion, abduction, or fraud for labor or services. There are no unreasonable restrictions on workers' freedom of movement in the facility in addi-

tion to unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, employees' dormitories or living quarters.

As part of the hiring process, all employees must be provided with a written employment agreement in the official language(s) of the country in which the employing Feintool site is located. Corresponding arrangements between Feintool and its employees in line with local laws are accepted. The agreement contains a description of terms and conditions of employment. Foreign migrant employees must receive the employment agreement prior to the employee departing from his or her country of origin and no substitution or change(s) are allowed to be made in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. By mutual agreement, changes are also possible before the employee has arrived at his or her receiving country.

All work as laid down in work contracts is voluntarily agreed upon by the employees. Workers have the right to terminate employment at any time without penalty by respecting the agreed notice periods. A previously agreed non-competition clause must be respected by the employee. Employers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time can employees be denied access to their documents. Workers are never required to pay employers' agents or sub-agents recruitment fees or other related fees for their employment.

A.2 Child Labor and Young Employees

Feintool does not tolerate child labor of any kind. A child's dignity must be respected, and their health and safety protected.

Thus, the term «child» refers to a person under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Employees under the age of 18 (Young Employees) are not allowed to perform work that is likely to jeopardize their health or safety. Feintool ensures proper management of Young Employees through proper maintenance of records, rigorous due diligence of educational partners, and protection of their rights in accordance with applicable laws and regulations. If child labor is identified, assistance/remediation is provided.

A.3 Working Hours, Wages, and Benefits

Working hours cannot exceed the maximum set by local law or collective bargaining agreements. In line with the labor markets in which Feintool operates, employees are compensated in a fair manner and in compliance with all applicable laws including those relating to minimum wages, overtime hours, and legally mandated benefits. For each pay period, employees are provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch, and outsourced labor is within the limits of the local law.

Further information on working hours, wages, and benefits can be found in the personnel policy and in the employee handbook. Collective bargaining agreements remain unaffected.

A.4 Humane Treatment, Non-Discrimination/Non-Harassment

As a globally acting group, Feintool follows a zero-tolerance policy in regard to any kind of discrimination against its employees or business partners. Any infringements which have been brought to the knowledge and have been proven will result in sanctions (see CoC chapter D.14).

That means:

Harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of employees is not permitted; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements are clearly defined and communicated to employees.

Feintool is committed to a workplace free of harassment and unlawful discrimination and does not tolerate any discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

On request and after consultation with the supervisor employees are provided with reasonable accommodation for religious practices. This does not affect the regulations about working hours and should not affect the working process.

A.5 Freedom of Association

In conformance with local law, Feintool respects the right of all employees to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities. Employees and/or their representatives can openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

B. HEALTH AND SAFETY

At Feintool, the protection and promotion of employees' health and safety is a top priority. The Group complies with all the applicable employment protection legislation to ensure a safe working environment. An effective health and safety management system is in place including specific and effective precautions in case of a pandemic. This Feintool Management System also governs the annual internal and external audits to verify adherence to specifications concerning occupational health and safety, measures to combat a pandemic as well as ergonomic workplace design to reduce the risk of accidents. It is the duty of all employees to avoid hazards posing a threat to human beings' health and safety.

Feintool recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products, services, and production processes. Feintool also recognizes that ongoing employee input and education are essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are:

B.1 Occupational Safety (Including Fire Protection)

Every production plant has – in accordance with the respective legal requirements – specialized occupational safety officers, with ultimate responsibility resting with the plant managers. Workers' potential exposure to health and safety hazards is identified and assessed during regular inspections and mitigated using the hierarchy of controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tagout), and providing

ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, employees are provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks associated with these hazards. Reasonable steps are taken to remove pregnant women and nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers.

The risk of fire will be reduced through good housekeeping measures being implemented at Feintool, raising staff fire safety awareness, fire training, appointing fire wardens, and carrying out fire risk assessments. Trained personnel will respond to fire alarm calls. They will take initial control of fire procedures with regard to the safety of staff, visitors, and premises. Feintool has appropriate fire response and control measures in place, and fire alarm incidents are recorded, monitored, and managed to minimize the number of incidents over time.

B.2 Emergency Preparedness

Feintool has had a proven quality management system and sound risk management for a long time. Potential emergency risks related to occupational safety, environmental protection, energy management, and the handling of hazardous waste and substances are identified during regular inspections, then assessed, and documented. To minimize their impact emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, training, and drills are implemented according to the respective legal requirements.

All workers receive occupational safety training periodically or as required by local law, whichever is more stringent (see CoC B.8). Regular work meetings are held to involve the workers in the continuous development of the Feintool health and safety procedures or management system. Emergency plans include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures focus on minimizing harm to life, the environment, and property.

B.3 Occupational Injury and Illness

Procedures and systems are in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, ensure access to necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of employees to work. Key figures related to occupational safety are published transparently in the Feintool sustainability report.

B.4 Industrial Hygiene (Potential Exposure to Diverse Agents)

Workers' potential exposure to chemical, biological, and physical agents is identified, evaluated, and controlled according to Feintool's hierarchy of controls: elimination, substitution, engineering controls, administrative controls, and personal protective equipment. Protective programs are ongoing and include educational materials about the risks associated with these hazards.

B.5 Physically Demanding Work

Workers' exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks are identified, evaluated, and controlled according to the respective legal requirements.

B.6 Machine Safeguarding

Feintool complies with strict safety requirements as outlined in the respective national laws. Production and other machinery are evaluated pro-actively and for safety hazards. Physical guards, interlocks, and barriers are provided and properly maintained where machinery presents an injury hazard to employees.

B.7 Sanitation and Workplace Ergonomics

Feintool ensures that all its workplaces are hygienic and provide an appropriate level of comfort to its employees (e.g., access to toilet facilities, potable water, sanitary food preparation opportunities). Feintool ensures proper maintenance of the above-mentioned facilities. Employees are required to keep the workplace and all facilities serving employees or the company in order at all times.

The Group provides adequate lighting in alignment with national regulations and is committed to establishing and maintaining proper workplace ergonomics e.g., properly adjusted workstations and chairs, avoidance of awkward movements to facilitate optimal working conditions. Workplace conditions and ergonomics are regularly reviewed according to the respective legal requirements.

B.8 Health and Safety Communication

Feintool provides employees with appropriate workplace health and safety information and training in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety-related information are visibly posted in the facility or placed in a location identifiable and accessible by employees.

Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers are encouraged to raise any health and safety concerns with the supervisor without retaliation.

C. ENVIRONMENT

Feintool is guided by the principles of sustainability and takes all necessary actions according to local law to protect the environment and to conserve natural resources within its sphere of influence. The Group management pursues a clearly defined environmental policy that applies to all companies. Quality and environmental management systems are in place: All production sites are certified in accordance with ISO 9001 as well as IATF 16949 for suppliers in the automotive industry. We are committed to certify as well all plants in accordance with ISO 14001 until 2023.

Feintool recognizes that environmental responsibility is key to delivering world-class products that are always state of the art. The Group is determined to continuously optimize the environmental footprint of its products and its entire operations. Feintool's risk management activities, and in particular its comprehensive quality and safety management, are closely tied to this goal. The Group reports annually on its environmental impacts and adverse effects on the community, environment, and natural resources within their manufacturing operations while safeguarding the health and safety of the public.

The environmental standards in detail are:

C.1 Environmental Permits and Reporting

Where applicable, all required environmental permits (e.g., discharge monitoring), approvals, and registrations are obtained, maintained, and kept current, and their operational and reporting requirements are followed.

C.2 Pollution Prevention

Emissions and discharges of pollutants and generation of waste are minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means.

C.3 Sustainable Resources and Water Management

Feintool is committed to protecting the environment and uses resources conservatively whilst complying with all applicable legal, regulatory requirements as well as environmental standards.

To use water and other natural resources, raw materials as well as operating supplies sustainably and minimize environmental impact, all production stages are designed to be as environmentally compatible and energy-optimized as possible. This can include the substitution of materials, re-use, conservation, and recycling amongst other means. We are subject to the requirements of the International Material Data System (IMDS) and we are committed to further developing our respective reporting in alignment with our management system.

Concerning sustainable water management, routine monitoring is used to control channels of possible contamination as well as to analyze water consumption to seek opportunities to conserve water.

C.4 Hazardous Substances and Responsible Chemical Management

Chemicals, waste, and other materials posing a hazard to humans or the environment are identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

C.5 Waste Management and Reduction

Feintool has implemented systematic waste management. The Group thus ensures that most of its production waste is recycled, and can therefore be reused as raw material. The rest is disposed of responsibly.

C.6 Air Emissions

Where applicable, air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting substances, and combustion byproducts generated from operations are characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances are effectively managed in accordance with the Montreal Protocol and applicable regulations. Routine monitoring of the performance of its air emission control systems is conducted.

C.7 Materials Restrictions

Feintool is committed to adhering to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

C.8 Greenhouse Gas Emissions, Energy Efficiency and Renewable Energy

The consumption of energy is of central importance to Feintool's production processes and core business activities. Therefore, the Group has long been committed to reducing its greenhouse gas emissions and mitigating its footprint by using energy and natural resources efficiently. In addition to complying with regulations and laws, Feintool tracks its energy consumption greenhouse gas emissions on a regular basis.

Feintool commits to constantly looking for methods to improve the energy efficiency of the production processes including the supply chain and to minimize the respective energy consumption and greenhouse gas emissions. Especially the sourcing of steel is essential to Feintool's core business. The Group is aware that the production process at the supplier level is energy-intensive and, therefore, Feintool welcomes innovative solutions that reduce CO₂ emissions, and is all the more determined to implement ongoing measures across its own group of companies, with the aim of increasing energy efficiency and reducing greenhouse gas emissions.

Feintool is committed to using renewable energy whenever feasible.

The Group also fosters environmentally aware behavior on part of all employees to conserve resources and lessen the impact on the environment.

D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Feintool upholds the highest standards of ethics including:

D.1 Business Integrity

The highest standards of integrity are upheld in all business interactions. All managers and employees of Feintool must refrain from actions that could damage the trust of our business partners and the public in Feintool.

Although this CoC is intended to provide guidance in specific situations, Feintool has a zero-tolerance policy in regards to the following topics:

- unsafe and illegal work practices
- violence and aggression
- discrimination, bullying, and harassment
- bribery and corruption
- retaliation against individuals who address injustices or do the right thing

Any proven breach of this CoC will be sanctioned (see CoC D.14). Feintool expects its suppliers to conduct their business in an ethical and responsible manner and act with integrity as well. Further details regarding Feintool's relationship with suppliers are outlined in separate documents (Feintool Purchasing Conditions, Feintool Supplier Code of Conduct as of 2022).

D.2 Anti-Corruption (Improper Advantage, Acceptance of Gifts)

Feintool follows a zero-tolerance policy on corruption. Corruption distorts competition, harms the free market, and – as a consequence – also harms the Group. Feintool does not tolerate corrupt behavior by employees, business partners, or customers. We always act in a transparent manner and in accordance with all applicable international anti-corruption and bribery regulations.

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

Managers and employees of Feintool may not accept any gifts or favors from suppliers, customers, or other business partners. This prohibition does not extend to less valuable items or invitations to ordinary business events as long as they are appropriate to the occasion and reasonable in scope. Visits upon invitation by the customer to events lasting longer than one day or requiring extended travel must be approved by the relevant line manager. Cases of doubt must be discussed with the line manager.

D.3 Disclosure of Information

Records and reports (both internal and external) must be correct, factual, and transparently performed. The principles of orderly bookkeeping and balance sheet accounting must be complied with. In particular, every accounting entry must be based on a documentary record that is true to the facts and all transactions must be recorded (e.g., «off-book» transactions will not be tolerated).

Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.

All Feintool funds and assets must be recorded in the accounts; illicit funds are strictly prohibited. The production of records, files, etc. involving the use of confidential company information is only permitted if undertaken in the direct interest of Feintool.

D.4 Intellectual Property, Counterfeit Product

Intellectual property rights are respected, transfer of technology and know-how is done in a manner that protects intellectual property rights, and customer and supplier information is safeguarded.

Risks in connection with counterfeit products and components are low due to Feintool's business activities. Raw materials (system parts production) are purchased directly from verified manufacturers and suppliers or are ordered by customers from agreed and official distribution channels. Any other goods and services are purchased from authorized business partners. All Feintool employees involved in the purchasing of goods and services are informed about the potential for counterfeit products and instructed that all goods must be sourced directly from the manufacturers or agreed and official distribution channels. Purchasing is subject to the Feintool compliance processes.

D.5 Data Privacy & Information Security

Personal data may only be collected, processed, or utilized to the extent necessary for defined, legal purposes. High technical standards must be set concerning data quality and protection of data from unauthorized access. The use of data must be transparent for those concerned. The rights of the lat-

ter to information and rectification of errors must be safeguarded, as must be – where applicable – their rights to lodge objections or have data blocked or deleted. Feintool complies with all applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

D.6 Feintool Property, Assets, and Items

Workers are responsible for the protection and correct usage of Feintool property and other tangible assets. Equipment and other items owned by the company (e.g., vehicles, computers, tools, data media, documents, office supplies, etc.) may only be used for company purposes. Any Feintool items have to be protected against loss and theft, damages, and misuse. Workers are not permitted to remove any such item from the company's premises without permission. Details are regulated in the local company car policy.

D.7 Fair Business, Competition, and Anti-trust Law

Standards of fair business, advertising, and competition are upheld. The company complies with current laws protecting and promoting competition, particularly current antitrust laws and other laws regulating competition. In competing for market share, Feintool is guided by the need to act with integrity. Every employee is obliged to comply with the rules of fair competition within the framework of the legal requirements. In particular, competitors are not permitted to divide up territories or customers, or to reach agreements or exchange information on prices/price components, delivery relationships, and their conditions, or on capacity or approaches to bidding. The same applies to exchanges of information on market strategies and stake-holding strategies. Agreements or exchanges of information on research and development projects are only permissible in exceptional, narrowly defined cases, which need to be approved by the management. The company's market position must not be illegally exploited in order to impose price discrimination, unsolicited deliveries of products, or refusals to deliver.

D.8 Confidentiality & Insider Information

Confidential company information must not be disclosed to or otherwise made accessible to third parties unless expressly authorized or unless the information in question is publicly accessible. This obligation to maintain confidentiality also applies after termination of the employment relationship.

Insider information means any unpublished information about Feintool or Feintool's business. The respective legal rules in force on insider trading apply.

Insider information is to be treated as strictly confidential, and must not be disclosed to third parties, even in abridged or summarized form. This also applies to the disclosure of passwords that provide access to electronically stored insider information. Disclosure of insider information to employees or external advisors is only permissible if the recipients need the information to perform their duties and have undertaken to treat the information as strictly confidential. Employees are referred to the instruction by the Executive Board regarding Insider Trading of 22nd November 2007.

D.9 Social Media

Social networks such as Facebook, LinkedIn, Xing, or Instagram are playing an increasingly important role in public discourse. Feintool also makes targeted use of social networks and its social media channels to communicate with employees, applicants, and the public.

Feintool is a cosmopolitan and globally active company and sees its employees as crucial ambassadors. Tolerance and respect are elementary and inflammatory, offensive, or discriminatory posts on social media are not tolerated

D.10 Conflicts of Interest (Shareholdings and Second Jobs)

Corruption frequently occurs as a result of conflicts of interest, i.e., where professional activities are affected by the private interests of one of the individuals involved. Managers and employees of Feintool must avoid situations that may lead to conflict between their personal interests and those of Feintool.

Secondary activities require Feintool's approval in all cases. In particular, approval will not be granted if the secondary activities violate laws or the interests of Feintool.

Board members of the Group and Group Management of Feintool with interests in companies with which Feintool Group companies maintain a commercial relationship must disclose these financial (except shareholdings of less than ten percent of the share capital in question) or other interests to Human Resources Management. Other interests to be disclosed include all positions such as membership of boards of directors or advisory boards, etc., and all consultancies.

To rule out conflicts of interest between the company and employees' private affairs, employees are strictly barred from hiring business partners closely involved in their area of duties for private purposes. Any exceptions require prior clearance from the employee's line manager and human resources manager. Feintool complies with the corporate governance guidelines of the SIX Swiss Exchange.

D.11 Donations

In the interests of good corporate citizenship, Feintool may make donations in cash or in kind to causes in the areas of education and training, science, culture, and social welfare. Donations must always be transparent. Both the recipient and the specific use must be verifiable at any time and in line with the Competence Matrix. Feintool does not make donations to political parties.

D.12 Responsible Sourcing of Raw Materials (including Minerals)

Concerning the sourcing of raw materials, Feintool is committed to tracking and ensuring best practices with respect to safety, health, environment, and ethics at all stages of the supply and production chain. In terms of volume, the procurement of steel is Feintool's first priority. The Group is subject to the requirements of the International Material Data System (IMDS).

Feintool does not source minerals from mines, but as a downstream company in the supply chain, the Group is committed that human rights are respected throughout the sourcing and supply chain of all materials. This applies in particular to minerals like tantalum, tin, tungsten, and gold, from conflict-affected and high-risk areas.

The Group's sourcing decisions are embedded in the Group's risk management, including due diligence (Supplier Code of Conduct, Feintool Purchasing Conditions) consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

D.13 Relationships with Suppliers and Customers

Suppliers must be selected solely based on objective criteria after comparing price, quality, and performance, and suitability. Agreements with customers and suppliers must be made in an unambigu-

ous form and must be documented together with subsequent amendments and supplements. All employees must strictly comply with the internal rules on the application of the dual control principle («two pairs of eyes») and the separation of executive and verification functions.

D.14 Customs and trade compliance

Feintool will ensure to not engage with persons or companies that have been placed by governments on sanctioned party lists. We will comply with regulations and laws that govern the distribution and use of our products in markets in which we choose to operate.

D.15 Whistleblowing, Protection against Retaliation and Sanctions

In addition to compliance with laws and regulations, Feintool employees must comply with the CoC, regardless of their location and the specialization of their work. No kind of misconduct will be tolerated. Misconduct is any conduct that violates the Feintool CoC and pertinent policies and/or external law or regulation.

With no exception, all workers are required to bring potential misconduct to the attention of Feintool without further disseminating the information. Workers should speak up if they have good grounds to suspect a violation and honestly believe that someone has done, is doing, or is about to do something that contravenes the Feintool CoC. Reported concerns are treated confidentially and Feintool will not reprimand, penalize or take action against any employee for making a good-faith report or for participating in the investigation of a good-faith complaint regarding a violation of this Code. At the same time, Feintool does not tolerate dishonest or misleading accusations.

Board members, department heads, business unit heads, team leaders, and other Feintool managers may also be disciplined for failing to notice such violations, provided that such failure is due to inadequate supervision of employees within their area of responsibility. If the executives at all levels fail to respond appropriately to violations, they may also face disciplinary action or sanctions.

All employees, as well as customers and business partners along Feintool's value chain, may contact an Ombudsman with regard to any questions or observations concerning the CoC. As listed below, Feintool is providing an Ombudsman in Europe, Asia, and the Americas as a contact person.

The Ombudsmen are all external professional lawyers and therefore are subject to professional confidentiality.

The Ombudsmen

- will take the breaches alleged
- preserve the confidentiality and anonymity of those who report a violation
- forward the information to the Compliance Officer of Feintool in Switzerland
- ensure that they are carefully investigated and support such investigations
- prepare documentation on an annual basis for their area of responsibility

The Feintool Compliance Officer, for his part,

- takes all reports of non-compliance and misconduct seriously
- is fully committed to investigating them efficiently and promptly
- is fully committed to ensuring facts assessing
- takes the adequate necessary disciplinary action and sanctions, which may include termination of employment or service and compensation claims

- ensures that all kinds of non-compliance and misconduct which has been brought to knowledge will be prosecuted and documented on an annual basis.

The Feintool grievance mechanisms that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained unless prohibited by law. The Group commits to assess workers' understanding of and obtain feedback on our implemented grievance mechanism to foster continuous improvement.

List of Ombudsmen

Region	Contact
Switzerland	Rechtsanwalt Andreas Amstutz LL.M. Amstutz Greuter Rechtsanwälte Hallerstrasse 6, Postfach 5122 3001 Bern, Schweiz Tel.: +41 31 306 99 99 Fax: +41 31 306 99 66 E-Mail: a.amstutz@amstutzgreuter.ch
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E. IMPLEMENTATION, MONITORING, AND REVIEW

To ensure proper implementation, monitoring, and review of this CoC, Feintool established the following procedures:

E.1 Company Commitment and Management Accountability

Feintool adheres to the principle of good corporate citizenship. All managers and employees must comply with national legislation in the various countries in which Feintool operates and must comply with the regulations outlined in this CoC.

Each business unit is responsible for ensuring compliance, in its own area, with the rules contained in this Code of Conduct and with others within the company. Management is required to ensure that breaches of the Code of Conduct and of rules issued subsequently are identified, pursued, and reversed. They will issue status reports to the Compliance Officer (CFO) at regular intervals.

E.2 Monitoring and Review

Feintool is committed to obtaining regular input from stakeholders, especially from the employees, in the continued development and implementation of the CoC. Every three years, Feintool self-evaluates the content of this CoC to ensure conformity to legal and regulatory requirements and Group-specific needs.

E.3 Information and Training

Every employee must be issued with a copy of this CoC and be trained on the rules it contains on commencement of their employment. Thereafter, employees receive a regularly training session via webinar on topics related to the CoC (see CoC B.2 & B.8). The attendance is documented.

Board Members and all other Feintool managers assume a role model function in the Feintool Group and must contribute to ensure that the regulations of the CoC are also lived in the company. All Feintool managers receive training on how to communicate and to implement the contents of the CoC in their respective areas of responsibility and day-to-day business.

Information about policies, practices, expectations, and performance to employees, suppliers, and customers are communicated regularly, clearly, and accurately. The appropriate channel for the communication is taken into consideration to ensure recipients receive and understand the communication. The Feintool CoC may be consulted on www.feintool.com/en/company/corporate-governance/principles/.

E.4 Reporting Irregularities and Grievance

All workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation (for further details please refer to CoC D.14).

E.5 Supplier Responsibility

Feintool expects its suppliers to conduct their business in an ethical manner and act with integrity. Further details regarding Feintool's relationship with suppliers are outlined in separate documents, especially the «Purchase Conditions» and the «Supplier Code of Conduct» as of 2022. The documents need to be signed by both Feintool as well as current and new suppliers before engaging in business activities.

REFERENCES

The following standards were used in preparing this Code:

[Eco Management & Audit System](#)

[Ethical Trading Initiative](#)

[ILO Code of Practice in Safety and Health](#)

[ILO International Labor Standards](#)

[ISO 14001](#)

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)

[OECD Guidelines for Multinational Enterprises](#)

[Universal Declaration of Human Rights](#)

[United Nations Convention Against Corruption](#)

[United Nations Convention on the Rights of the Child](#)

[United Nations Convention on the Elimination of All Forms of Discrimination Against Women](#)

[United Nations Global Compact](#)

[United Nations Guiding principles on business and human rights](#)

[United States Federal Acquisition Regulation](#)

[SA 8000](#)

[SIX Swiss Exchange Corporate Governance Guidelines](#)

[Social Accountability International \(SAI\)](#)

APPLICABILITY AND DOCUMENT HISTORY

The regulations of this CoC were approved at the meeting of the Feintool Board of Directors on 22nd August 2022. The CoC comes into effect on 1st of January 2023 in all companies under the managerial control of the Feintool Group. It may be amended or expanded by the Board of Directors at any time.



Alexander von Witzleben
Chairman of the Board of Directors